

Let's Surf Coalition

Preserving and enhancing public access to, and usage of, the beaches and near shore waters.

August 13, 2007

Mr. Wilfred Ho
Department of Parks and Recreation
Windward Oahu District
P.O. Box 4042
Kaneohe, Hawaii 96744

RE: Proposed Water Event Rules for the North Shore

Dear Mr. Ho:

Let's Surf Coalition is committed to balancing the public's right to enjoy its recreational resources with the requests of private parties to organize surf contests at the City's Beach Parks. We appreciate the difficulty in updating the rules, but we are disappointed to see some rule changes that were vehemently opposed by the community in 2001 when the last draft rules were proposed.

Regarding the proposed rules:

19-4-9 (h): Simultaneous Events will not be accepted anywhere on the North Shore. Surely you remember the passion in the Sunset Beach Cafeteria when the public was last invited to comment.

19-4-9 (i): The surf season lasts longer than October through March. We suggest that 19-4-2 Application be changed to "These rules govern surf events..." Surf Event is described in the definitions, so there should be no conflict with other Shore Water Events. The North Shore Calendar should start September 1st and end on August 31st of the following year.

19-4-9 (c): Eight Half-Days are too many. The rules allow contest directors to select the best days for competition in the waiting period and the public gets what is left over. Often, there are not even four good days in a two week period. If contests cherry pick the best four hours of eight separate days, the public may lose four more days of surfing opportunity in the same waiting period. A sensible compromise would be that one full day of competition per event could be broken into two half days.

19-4-9 (b): The competition day should have an end time. The current requirement is 4:30 pm.

19-4-9-12: When waiving any rule, the Director should be required to do so in writing and should be required to explain how the waiver does not violate the spirit and intent of the established rules.

These concepts should be incorporated into the rules:

A cap on the total number of competition days must be established for the North Shore. Presently, contests are concentrated at three beach parks. While 48 days of competition per year is already a large number, we suggest that the maximum number of permitted contest days could be reasonably capped at 54. This would allow a slight increase in total competition days and allow events to relocate to other sites, as approved by the Director, without placing an unbearable burden on the public.

Man-on-man heats and non-elimination formats are inefficient uses of a very precious resource. Heats with less than four contestants must continue to be restricted and the number of competition days should be determined by the number of surfers processed. A reasonable requirement would be 32 surfers processed per competition day.

The parks and near shore waters belong to the residents of the City and County of Honolulu and the State of Hawaii. Every surf contest should be required to provide a minimum of 25 percent of the seeds in the main event for residents of the State of Hawaii.

Regarding permit conflict resolution, we offer the following suggestions and questions:

An appeals process should be identified for promoters who are denied a permit.

The weighted point system must be carefully structured so that popular amateur events such as the Menehune Contest are not displaced by an aggressive application from another promoter.

19-4-6 (l): What triggers the request for financial statements? How would this information be used?

19-4-6 (m): What is the purpose of collecting heat sheets? How might this information be used?

19-4-7 (b): What are violations that may result in ineligibility to apply for future permits?

The mission of the Department of Parks and Recreation “is to enhance the leisure lifestyle and quality of life for the people of Oahu through active and passive recreational opportunities.” The changes recommended herein will make the Water Event Rules more reflective of the needs and wishes of surfers who enjoy the North Shore of Oahu.

Respectfully,



Gil Riviere
President

Cc: Mr. Lester Chang, Dept. of Parks and Recreation
North Shore Neighborhood Board
Councilman Donavan Dela Cruz