

Laura H. Thielen  
Director  
Honolulu Department of Parks and Recreation  
650 S King St Honolulu, HI 96813

May 24, 2023

Re: Comments on Proposed Rule Changes for Surf Contest Permits

Dear Director Thielen,

The Department is seeking to address City Council Resolutions that direct the Department to ensure gender equity in surf events permitted by proposing a scoring system. In this system, a maximum of 12.5% of points can be allocated in a gender equity subsection under the broader category of diversity. However, it is my belief that this approach will not adequately address the problem of gender equity in surf contests.

Gender equity is not merely a scoring factor but a fundamental civil right protected by Hawaii State law. As per Article I, Section 5 of the Hawaii Constitution, individuals should not be denied the enjoyment of civil rights or face discrimination in exercising those rights based on race, religion, sex, or ancestry.

It is essential to recognize the distinction between diversity and gender equity. Gender equity centers on the goal of providing equal opportunities for individuals of different genders, regardless of their backgrounds or characteristics. Its aim is to eliminate gender-based disparities and biases, ensuring that individuals have equal access to opportunities and resources. On the other hand, diversity primarily focuses on representation and inclusion of various groups, including gender. However, diversity efforts do not fully address the deeper-rooted inequalities and barriers specific genders face.

By emphasizing gender equity as a distinct concept and acknowledging its significance in ensuring equal opportunities, the Department will uphold the principles of fairness, justice, and inclusivity in surf events permitted by the Department.

The proposed **gender equity model** below outlines a proactive approach to ensuring equal opportunities for all genders in sports competitions, particularly when there is an unequal number of male or female participants. Here is a breakdown of the model:

1. Equal opportunities for all genders: The model aims to provide equal opportunities to all genders participating in sports competitions, ensuring that each gender has an equal chance to compete regardless of participant numbers.
2. Number of competitors: The model suggests striving for an equal number of competitors from each gender to achieve fair representation and balance.
3. Time in the water: The model recommends equal opportunities in terms of time in the water, allowing both male and female competitors comparable chances to showcase their skills and compete on an equal basis.
4. Prize money: The model advocates for equal opportunities in terms of prize money, ensuring that monetary rewards for winning or placing in the competition are equal for both male and female participants.

5. Implementation through a drop-dead date: The model proposes using a drop-dead date, a specific deadline for each gender to enter the event. If slots for a particular gender are not filled by the deadline, the remaining slots would be opened to competitors of the opposite gender who have registered on an alternate list. This approach ensures the utilization of all available opportunities and avoids leaving slots unused.

Additionally, international and national sports leagues seeking to impose their gender-discriminating league rules upon Hawaii's surfing sports can be required to modify their formats to meet the criteria of gender equity required by Hawaii State Law and as desired by the Honolulu City Council

By implementing this model, organizers can actively work towards achieving gender equity in sports competitions, promoting fairness, inclusivity, and equal opportunities for all participants, regardless of their gender. This solution also aligns with the ideals upheld by major sporting events like the Olympics, where the 2020 Olympic Games held in Tokyo in 2021 hosted 49% of athletes who identified as female.

Sincerely,



Carol Philips  
66-117 Awai LN  
Haleiwa, HI 96712  
[carolphilips1@gmail.com](mailto:carolphilips1@gmail.com)  
cell: 808-779-6222