APPENDIX C

SilverRock Resort Traffic Evaluation

URBAN CROSSROADS
41 Corporate Park, Suite 300 Irvine, CA 92606 949.660.1994 main 949.660.1911 fax www.urbanxroads.com

May 17, 2006

Mr. Tony Locacciato
IMPACT SCIENCES, INC.
803 Camarillo Springs Road
Camarillo, CA 93012

Subject: Silver Rock Resort Traffic Evaluation

Dear Mr. Locacciato:

The firm of Urban Crossroads, Inc. is pleased to submit the following traffic evaluation for the proposed Silver Rock Resort development. The site is located south of Avenue 52 and west of Jefferson Street in the City of La Quinta (see Exhibit A). The uses will consist of a mixture of resort hotels, a conference/community center, commercial uses, and timeshare units. The intent of this letter is to identify if the project would contribute towards the need for additional improvements beyond what is planned in the General Plan Circulation Element.

To this end, research has been conducted to identify land use and trip generation information that were assumed in the General Plan. Coordination with City staff has been undertaken to determine what land uses have been constructed in the area and what uses are planned (if any) beyond what is anticipated for the project. A comparison of the project land uses and trips with the previous General Plan assumptions are presented to determine if new or additionally more significant impacts are anticipated to occur.

Project Description

As indicated above, the project consists of a mixture of resort hotels, conference/community center, commercial uses, and timeshare units as illustrated on Exhibit B. The project would take access to both Avenue 52 and Jefferson Street. It is

our understanding that the current proposal consists of a mixture of uses with the maximum land use densities as follows:

DESCRIPTION	MAXIMUM UNITS
Resort Hotel	334 Rooms
Timeshare	1,020 Units
Conference/Community Center	10,000 SF
Restaurant	15,000 SF
Mixed Use Village	100,000 SF Ground Floor 60,000 SF 2nd Floor
Golf Course	36 Holes

Project Trip Generation

Trip generation represents the amount of traffic which is attracted and produced by a development. The traffic generation for the project is based upon the specific land uses which have been planned for the development. As indicated above, the project site is proposed to be developed with resort hotels, a conference/community center, commercial retail and timeshare land uses.

Trip generation rates for this project are shown in Table 1. The trip generation rates are based upon data collected by the Institute of Transportation Engineers (ITE) and others on similar timeshare sites (see Appendix "A").

Both daily and peak hour trip generation for the proposed project are shown in Table 2. The proposed development is projected to generate a total of approximately 20,021 trip-ends per day with 1,423 vehicles per hour during the AM peak hour and 1,834 vehicles per hour during the PM peak hour. The traffic volumes shown in Table 2 consist of the

total trips generated for each project land use. As a resort hotel/timeshare trip generated by the project will also be making trips to the golf course/commercial land uses within the project, a double counting of those trips occurs. Therefore, a reduction in externally oriented trips could be applied to these estimates to develop a more realistic estimate of trips assigned to the adjacent roadway system.

General Plan Model Inputs

The City's current General Plan was adopted in 2002. As part of the General Plan Circulation Element, extensive long range travel demand modeling was performed to identify the appropriate roadway infrastructure/classifications to support the buildout of the City's Land Use Element. Exhibit "C" illustrates a portion of the zone structure for the General Plan traffic model. As indicated in this exhibit, the project resides partly in both TAZ's 961 and 965. The traffic model indicates that these zones will generate a total of 40,330 trips per day. After balancing of the internal interactions within the zones, a total of 31,202 trips per day were assigned to the roadway network.

Trip Generation Comparison

A comparison of the trip generation estimates between the model and project indicates that the model was assumed to generate approximately 11,181 more trips (11,181 = 31,202-20,021) than the project. One of the 18-hole golf courses is currently situated on portions of both TAZ 961 and TAZ 965. Again, it is important to note that this reflects a conservative estimate due to the model trips representing the externally routed traffic and the project trips representing driveway estimates.

Conclusions

Based upon this review, the project can be accommodated within the planned circulation system, if the General Plan Circulation Element roadways are implemented. Due to the magnitude of the differences in the future traffic forecasts, it is further anticipated that no new or more significant impacts would result due to the proposed project development. It is recommended that subsequent traffic studies be prepared to evaluate the needs at the project access points and to monitor the interim needs at the surrounding study area intersections.

If you have any questions regarding this analysis, please do not hesitate to call at (949) 660-1994.

Sincerely,

Scott Sato, P.E.
Principal

SS:mt
JN:03251-03

Attachments

TABLE 1

TRIP GENERATION RATES[1]

LAND USE	ITE CODE	QUANTITY	UNITS[2]	PEAK HOUR TRIP RATES						DAILY
				AM			PM			
				IN	OUT	TOTAL	IN	OUT	TOTAL	
Resort Hotel	330	334	RM	0.22	0.9	1.12	0.18	0.24	0.42	4.2
Timeshare	Appendix "A"[3]	1020	DU	0.13	0.43	0.56	0.35	0.2	0.55	5.86
Shopping Center	820	160	TSF	0.79	0.51	1.3	2.56	2.77	5.33	57.61
Conf. Center	495	10	TSF	0.99	0.63	1.62	0.48	1.16	1.64	22.88
Restaurant	932	15	TSF	5.99	5.53	11.52	6.66	4.26	10.92	127.15
Golf Course	430	36	holes	1.75	0.47	2.22	1.21	1.53	2.74	35.74

1 Source: ITE (Institute of Transportation Engineers) Trip Generation Manual, 7th Edition, 2003.

2 RM = Room, DU = Dwelling Units, TSF = Thousand Square Feet

3 Appendix "A" - Timeshare Trip Generation Study

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TABLE 2

SILVERROCK RESORT TRIP GENERATION SUMMARY

LAND USE	QUANTITY	UNITS[1]	PEAK HOUR						DAILY
			AM			PM			
			IN	OUT	TOTAL	IN	OUT	TOTAL	
Resort Hotel	334	RM	73	301	374	60	80	140	1,403
Timeshare	1020	DU	133	439	572	357	204	561	5,977
Shopping Center	160	TSF	126	82	208	410	443	853	9,218
Conf. Center	10	TSF	10	6	16	5	12	17	229
Restaurant	15	TSF	90	83	173	100	64	164	1,907
Golf Course	36	holes	63	17	80	44	55	99	1,287
TOTAL			495	928	1,423	976	858	1,834	20,021

[1] RM = Room, DU = Dwelling Units, TSF = Thousand Square Feet

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EXHIBIT A

LOCATION MAP

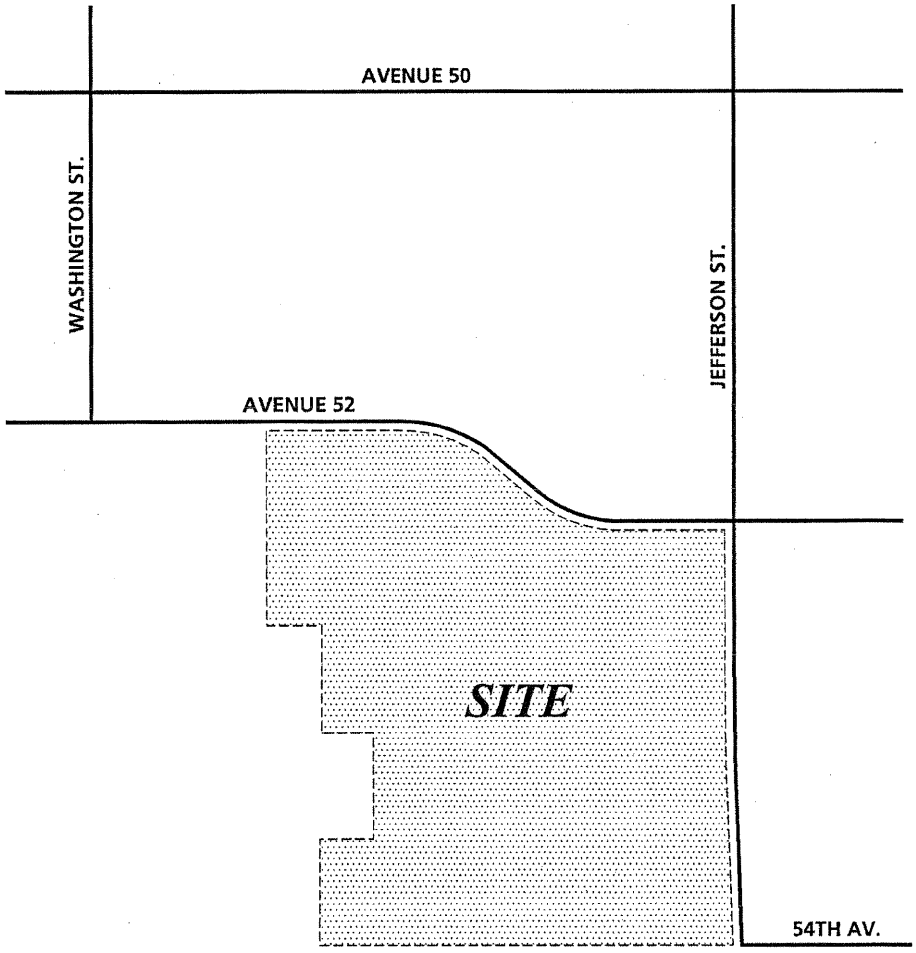

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EXHIBIT B

SITE PLAN

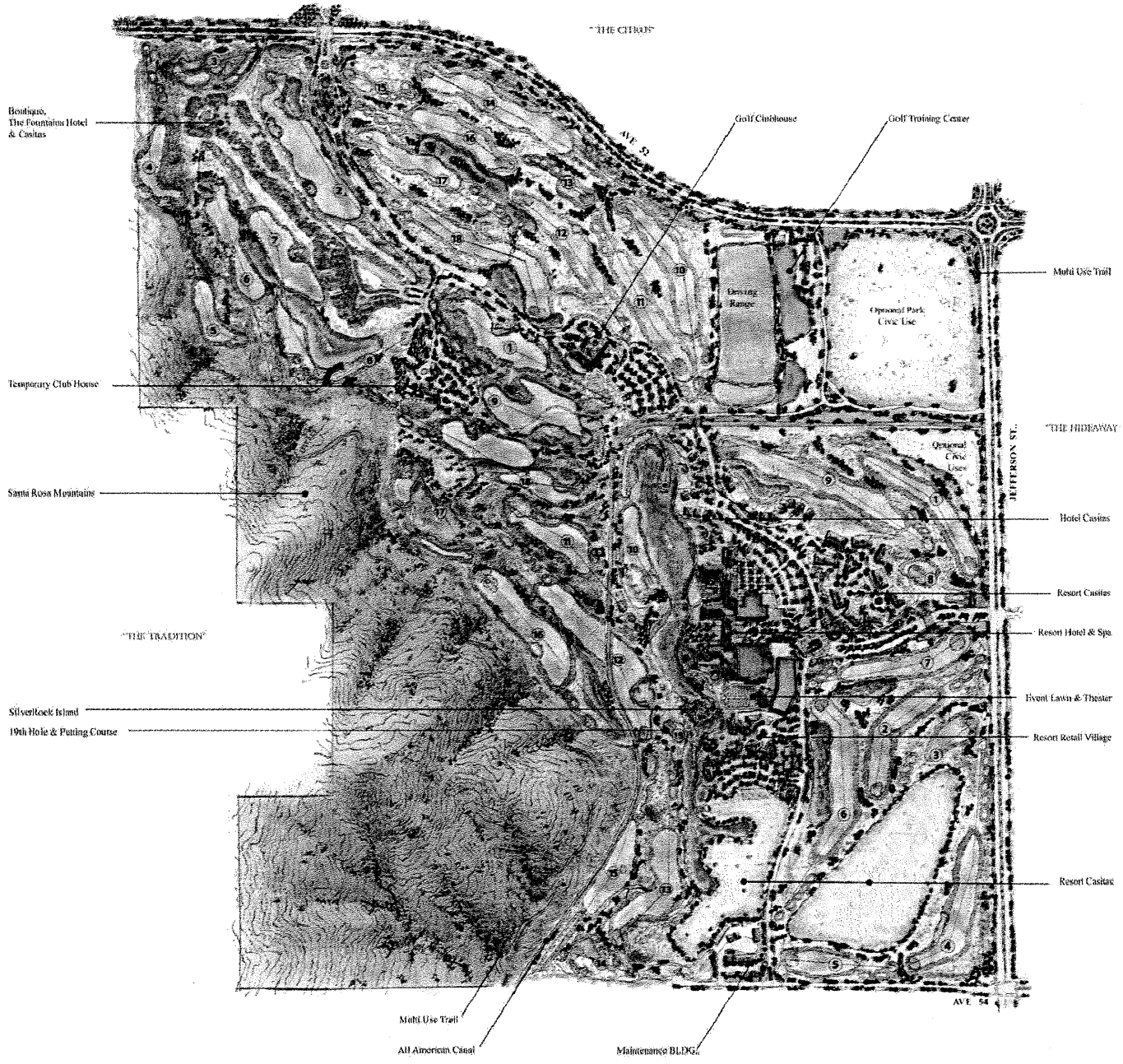

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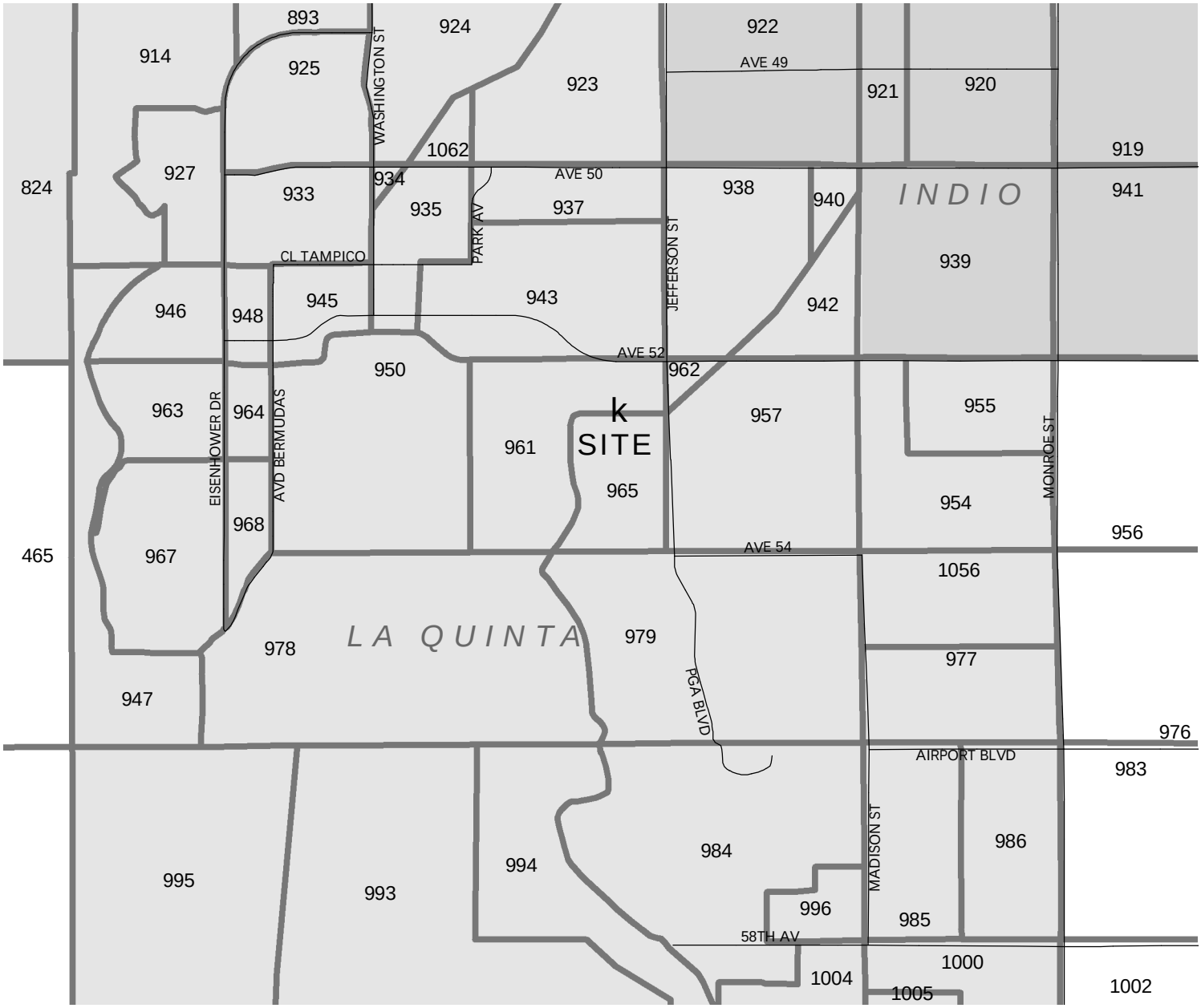
EXHIBIT C

TRAFFIC ANALYSIS ZONE (TAZ) STRUCTURE



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0 1,400 2,800

Feet

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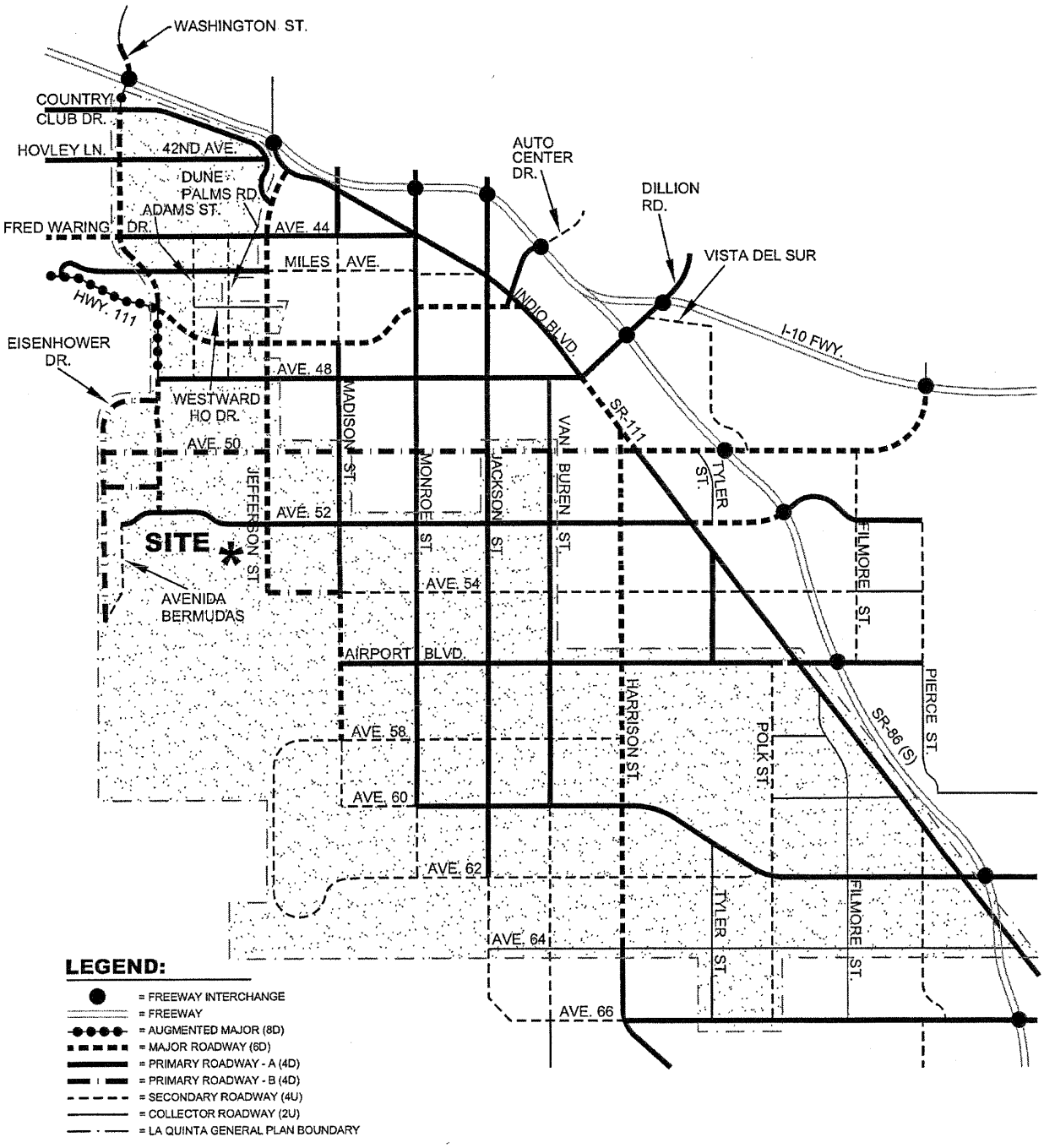
EXHIBIT D

CITY OF LA QUINTA
GENERAL PLAN CIRCULATION ELEMENT



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SILVER ROCK, LA QUINTA, California - 03251: 04

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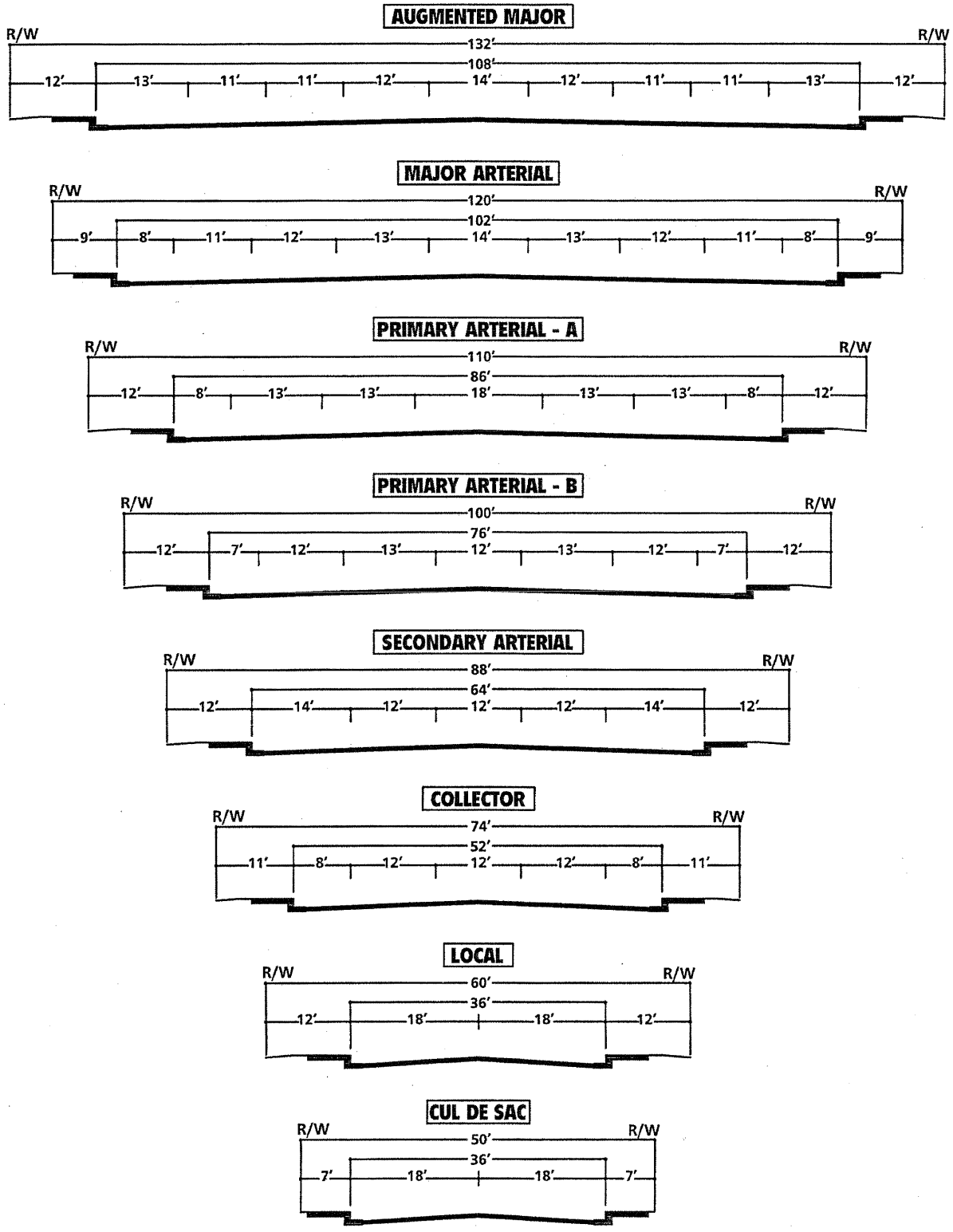
EXHIBIT E

CITY OF LA QUINTA
GENERAL PLAN ROADWAY CROSS-SECTIONS



SOURCE: CITY OF LA QUINTA

URBAN CROSSROADS

APPENDIX A

TIMESHARE TRIP GENERATION STUDY

HIGGINS ASSOCIATES
CIVIL & TRAFFIC ENGINEERS

1335 First Street, Suite A, Gilroy, CA 95020 • 408 848-3122 • fax 408 848-2202 • e-mail info@kbhiggins.com

May 1, 1998

Mr. Carl Ballard
RKJK
1601 Dove Street, Suite 290
Newport Beach, CA 92660

Re: Trip Generation Data for Hyatt Vacation Club Timeshare, City of Indian Wells, California

Dear Carl:

Per your request, enclosed is a summary of our findings on trip generation data for timeshare and related uses. Unlike hotel, condominium, and recreational home uses, very little published trip generation data is available on timeshare and vacation club uses. For your reference, a 4-page document is attached entitled "Trip Generation Rate Research" which was prepared by Higgins Associates in 1996 for the conversion of the existing Highlands Inn to Timeshare in Monterey County.

This letter report provides a compendium of trip generation data for timeshare use. The appropriate daily and peak hour trip generation rates for the proposed Hyatt Vacation Club will depend on its setting, size, physical characteristics, and operational characteristics. Setting refers to the location (eg. Santa Monica Mountains, Big Sur coastline, or Carmel Valley), environment (eg. urban, suburban, rural, country side, mountain, or remote), and attractions (eg. near beach, theme parks, recreational trails, or monuments). Size refers to the total number of timeshare units. Physical characteristics refer to on-site amenities such as bar, lounge, restaurant, barbeque dining, banquet/wedding facilities, retail shops, spa, swimming pool, gymnasium, golf course, and tennis court. Operational characteristics refer to vacation packages, programs, services, and activities anticipated on-site as well as at nearby off-site locations within walking distance of a timeshare facility.

As discussed above, the traffic generation characteristics of a timeshare facility vary considerably depending on its intended use and intensity of use. Traffic generation characteristics of timeshare facilities tend to closely resemble that of either a hotel, a luxury condominium/townhouse, a recreational home, or a vacation club. It is dependent on which of these land use categories the timeshare facility is most similar to. Hotels typically provide full room services, sleeping accommodations, restaurants, cocktail lounges, retail shops, banquet/wedding facilities, and conference/meeting rooms. As confirmed by survey data at the San Luis Bay Inn, a timeshare facility, timeshare facilities have lower traffic generation potential than full-service hotels with similar setting and amenities, especially considering trips generated by sales and promotion activities at the San Luis Bay Inn during the survey.

Luxury condominium/townhouses typically provide luxury facilities and services. Luxury condominium/ townhouse units are usually owned by individual owners. Recreational homes are typically located in a resort containing local services and complete recreational facilities. Recreational homes are usually owned

by individual owners. Vacation Clubs typically provide amenities and services similar to recreational homes. Recreational homes and vacation clubs generally have low traffic generation potential because relatively few guests need to drive to off-site locations for food, services, and recreation.

If the proposed timeshare facility operates similar to a hotel, ITE's hotel trip rates can be used to conservatively estimate project trip generation. Alternatively, the timeshare daily trip rate derived from the San Luis Bay Inn data can be used. The ITE hotel's *% of Daily* and *directional in/out split %* were applied to the San Luis Bay Inn's daily trip rate to determine timeshare weekday AM and PM peak hour trip rates. The San Luis Bay Inn's timeshare daily trip rate is 8.31 trips per occupied unit, which is 7% lower than ITE's hotel daily trip rate of 8.92 trips per occupied unit. An example of timeshare units analyzed as hotel rooms is the Sands of Monterey Resort (375 hotel rooms, 84 timeshare units, 101 condominium units) in the City of Sand City, California.

If the proposed timeshare facility operates similar to a condominium, ITE luxury condominium/townhouse trip rates can be used to estimate project trip generation. For luxury condominium/townhouse, ITE's daily trip rate is 5.86 trips per occupied unit, which is 34% lower than ITE hotel daily trip rate of 8.92 trips per occupied unit. An example of timeshare units analyzed as a condominium is the Marriott Timeshare (236 timeshare units) in the City of Palm Desert, California.

If the proposed timeshare facility operates similar to a recreational home or vacation club, the Transpo Group daily trip rate can be used to estimate project trip generation. However, no weekday street peak hour data was published by the Transpo Group. The ITE's recreational home's *% of Daily* and directional in/out split % were applied to Transpo Group's vacation club daily trip rate to establish the vacation club AM and PM peak hour trip rates. The Transpo Group's vacation club daily trip rate is 6.9 trips per occupied unit, which is 23% lower than ITE's hotel daily trip rate of 8.92 trips per occupied unit. An example of timeshare units analyzed as vacation club units is the Gleneden Beach Vacation Club (81 timeshare units) in the City of Lincoln City, Oregon.

A total of four exhibits are attached. Exhibit 1 provides a comparison of daily and peak hour trip generation rates per occupied room for various land uses from several sources. Our recommended weekday trip rates are also illustrated on Exhibit 1. Vacation club survey data obtained from the Transpo Group are summarized on Exhibit 2. Timeshare survey data at San Luis Bay Inn performed by Higgins Associates are summarized on Exhibit 3. Examples of trip rates used in other traffic studies of timeshare facilities are summarized on Exhibit 4.

In the case of the proposed 300-unit Hyatt Vacation Club Timeshare project, the project description (ie., a kitchen in each unit, no restaurant, and no retail space) indicate that trip generation rates for luxury condominium/townhouse are the most appropriate. The luxury condominium/townhouse trip rate is 5.86 daily trips per occupied unit, with 0.56 trip (23% in, 77% out) in the AM peak hour and 0.55 trips (63% in, 38% out) in the PM peak hour.

If you have further questions regarding this letter report, please feel free to call me at 408 848-3122. Thank you for this opportunity to assist you on your project.

Sincerely,

Philip Ho, TE
Project Manager

Keith B. Higgins, CE, TE
President

enclosure

cc. Mark Solit

HIGGINS ASSOCIATES
CIVIL & TRAFFIC ENGINEERS

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TRIP GENERATION RATE RESEARCH FOR HIGHLANDS INN CONVERSION TO TIMESHARE December 2, 1996

This report summarizes our findings on trip generation rates for the conversion of Highlands Inn from the existing hotel use to a timeshare facility.

A. DATA RESEARCH

Available information regarding timeshare condominium trip generation rates was researched including a literature search and telephone communications with persons with information regarding this subject.

1. Literature Search

A literature search was conducted which included reviewing our firm's library and contacting the Institute of Transportation Studies at the University of California, Berkeley. Unfortunately, no published information was found pertaining to trip generation rates for Timeshare.

2. Personal Interviews

In addition to the literature search, municipalities with Timeshare Condominiums and individuals knowledgeable with Timeshare Condominiums and Timeshare Condominium conversions were contacted. The following summarizes the information obtained.

a. A traffic study was prepared for Marriott Timeshare Condominiums located in Palm Desert, California by ASL Consulting Engineers, June, 1989, for the Marriott Ownership Resort. The project included 236 condominium units located in a resort setting. Marriott projected an average party of 4.7 people and an average length of stay of 4.5 days with an occupancy rate of 90% to 95%. Trip generation for the project was estimated using Residential Condominium rates from the Institute of Transportation Engineers, Trip Generation, 4th Edition, with the assumption that the project would experience 100% occupancy during the peak season. This yielded rates of 5.857 trip ends per unit per weekday, 0.446 trip ends per unit per morning peak hour and 0.561 trip ends per unit per evening peak hour. A trip end represents the end or beginning of a trip. For example, a trip from Fisherman's Wharf to the Inn would constitute one trip and two trip ends, one trip end at the Fisherman's Wharf origination and one trip end at the Inn destination. The traffic report did not estimate weekend daily or peak hour traffic.

A Marriott Timeshare Condominium unit is typically a two bedroom/two bathroom unit while the Highlands Inn typical unit will be comprised of one bedroom with a bathroom. Therefore, the party size at the Highlands Inn is anticipated to be lower than the average party of 4.7 people reported by Marriott.

b. Tim Stripe, with Continental Development, has overseen the development of two Timeshare projects. In both cases Hotel trip generation rates, as published by the Institute of Transportation Engineers, were used. Mr. Stripe mentioned this was a conservative approach as his observation has been that Timeshares typically generate less traffic than hotels per occupied unit as the duration of the visit to a hotel is typically shorter than that of a Timeshare. In addition, Mr. Stripe stated that Timeshares are more apt to be located with food, beverage, and recreational services on site. Also, he felt that peak hour trips would be lower as Timeshare guests typically schedule their trips during off-peak periods.

c. The Cathedral City Planning Department was contacted regarding a Timeshare conversion located in that jurisdiction. Claudia Gamlin, Planner, stated a traffic report was not required for the Timeshare.

d. The City of Del Mar was contacted regarding the Del Mar Inn Conversion. Kent Whitson, the City of Del Mar Consulting Traffic Engineer who also coordinates trip generation studies for the San Diego Association of Governments (SANDAG), stated that no formal data was available and recommended using multi-family or lodging trip generation rates.

e. Ken Mathis, with the City of Pacific Grove Public Works Department was contacted regarding the PG Plaza Timeshare. The PG Plaza Timeshare is comprised of approximately ten Timeshare units located above a retail plaza. No report was completed for the conversion which occurred approximately ten years ago. Mr. Mathis did say there appears to be very little difference in the traffic generated before and after the conversion. He stated the biggest difference in the traffic occurs during the sell out period when additional traffic is attracted to the project for the sales presentations.

f. John Burlingame, with HT-Highlands, Inc. provided information pertaining to his past experience with Timeshares and the planned marketing and operations of the Highlands Inn Timeshare. Although very little specific information is available, the length of stay at a Timeshare is typically longer than at a traditional hotel. While the Highlands Inn operating as a hotel has an average length of stay of 1.95 days it is anticipated that the average length of stay at the Highlands Inn Timeshare will be 4 to 6 days, similar to the Marriott Condominium Timeshare. Historically, people with longer visits at a facility will spend more time at the facility and generate less trips.

Regarding the sell out period, Mr. Burlingame stated a strategy has been developed to obtain much of the Highland Inn Timeshare sales from the people already staying on the property. Due to the Highlands Inn's reputation for quality and the marketing company's experience in Florida's Key West, a higher close (sale of the property) rate, approximately 15%, is anticipated with many of the purchases from persons already familiar with the property. The Key West project has obtained a close rate of 11.4% with outside (off the property) sales only. Marketing strategies include a mini-vacation program and lunch or dinner program which will offer lodging and/or meals in exchange for participating in a tour (the sales program for the project). This will further encourage purchases from people already staying on the property or visiting the on-site restaurant.

Other inquires to obtain data have been made, including David Matheson with American Resort Association and Tony Castro with Douglas County, Nevada. However, as of this date no

response has been obtained.

B. TIMESHARE VERSUS HOTEL CHARACTERISTICS

Although no definitive trip generation data was obtained a significant amount of anecdotal information was gathered that was consistent among the various individuals interviewed. They are as follows:

1. Timeshare amenities and consumer use differ from hotels in several ways. Timeshares are typically sold in weekly increments and in some cases on a split week basis. Therefore, the length of stay at Timeshare is typically longer than at a hotel. Timeshare consumers are more likely to have a larger party size than the traditional hotel occupant as the typical timeshare will accommodate a larger party than a hotel. However, the Highlands Inn Timeshare with their one bedroom with a bath unit would be more conducive to a smaller party size.

2. During sell out of the Timeshare additional traffic is generated from potential buyers. Typically on a conversion the developer would continue to rent out the unsold inventory until complete sellout. Those units already sold would be used by the owners. In addition, those interested in purchasing will visit the site. It has been estimated that, on average, ten people attend an on-site sales presentation for every one Timeshare sold. However, given that the Highlands Inn is an existing project with considerable existing repeat demand, a higher close rate is estimated.

3. Consequently, additional traffic generation during sell out can be significantly reduced where a higher percentage of sale closure is attained, as expected with the Highlands Inn. Other techniques such as the implementation of reduced rental rates for attending a sales presentation can offset sales related traffic with traffic associated with the on-going hotel operation. A limit on the number of sale visits scheduled can also reduce sell out traffic. This technique, correspondingly, lengthens the duration of the sales.

C. TIMESHARE TRIP GENERATION

Trip generation for the Highlands Inn Timeshare is presented for the existing use, the proposed Timeshare, and for the additional traffic during the sell out period.

Higgins Associates, as part of the December 1984 letter-report on the traffic element of the Draft EIR for the Point Lobos Ranch, calculated the trip generation for the Highlands Inn and the Tickle Pink Inn (a 34-unit hotel) based on traffic counts conducted Thanksgiving weekend, 1984, when both hotels were at full occupancy. A daily traffic generation rate of 11.9 trip ends per room was determined for both weekday and Saturday. A weekday evening peak hour rate (during the Highway 1 peak hour) of 1.03 trip ends per occupied room was determined as well. Project trip generation determined at that time is tabulated on Exhibit 1.

Timeshare trip generation rates were tabulated based on the information and recommendations received during the data research activity described earlier in this letter. Rates published by the Institute of Transportation Engineers, "Trip Generation," Fifth Edition, 1991, for a residential condominium/townhouses, hotel and resort hotel are tabulated on Exhibit 1. Rates published by San Diego Traffic Generators, January 1990 for resort hotels and residential condominiums are also tabulated on Exhibit 1.

The highest estimated daily traffic generation occurs with the Resort Hotel land use designation published by the Institute of Transportation Engineers. Approximately 1,372 trip ends are anticipated during the weekday and 1,519 during Saturday. This is 330 less weekday daily trip ends and 183 less Saturday daily trip ends than generated by the Highlands Inn under its existing use.

The highest estimated morning peak hour volume is anticipated to be 75 trip ends while the highest estimated evening peak hour volume is anticipated to be 102 trip ends, 45 trip ends less than the existing evening peak hour volume. Although the directional distribution associated with each of the rates varies, clearly the proposed Timeshare use would generate less traffic under any of the five land use designations tabulated on Exhibit 1.

The proposed conversion to Timeshare units is anticipated to generate approximately 42 less Saturday daily trip ends than the existing Highlands Inn when comparing the highest anticipated proposed development trip generation to lowest estimated trip generation for the existing Highlands Inn. This results in an approximate 3% reduction.

However, during the sell out period additional traffic will be attracted to the site. Similar to traffic generation for Timeshare units there is no available data regarding traffic generation during the Timeshare sell out period. Historically it takes about ten people to go through the sales process for every closure. The average person purchases 1.3 weeks. Each Highlands Inn Timeshare unit would be available only 51 weeks of each year. Therefore, approximately 53,000 tours would be required to sell the property assuming a 10% close rate. The project proponent is projecting a six year sell out period which would equate to 9,935 tours per year.

To minimize sales staff, tours would be offered fairly evenly over 362 days of the year. (The sales facility would be closed only three days a year.) This would yield approximately 24 tours a day, or 48 trip ends per day.

Additionally, the Highlands Inn Timeshare projects a close rate of up to 15% as well as anticipating that a substantial amount of their tours will contain people already staying on the property. The Highlands Inn currently runs at an average of 80% occupancy with 1.95 days the average length of stay. This provides approximately 55 rooms a day which house different guests. The Highlands Inn Timeshare expects to obtain a 20% capture rate of these guests for their sales presentation. Further, the Highlands Inn Timeshare will likely run a mini-vacation program as a marketing tool, the guests stay at a reduced rate in return for their attendance at a sales presentation. By achieving a 15% close rate, the additional daily trip ends would likely be less than the estimated 48 per day, perhaps as low as 42 trip ends per day or lower when sales to guests on-site are considered.

D. CONCLUSIONS AND RECOMMENDATIONS

The project is anticipated to generate less traffic, even during the sell out period, than the existing use. This is based on the consensus of the individuals contacted regarding timeshare conversions. Therefore, no traffic impact mitigations are recommended.

EXHIBIT 1

COMPARISON OF TRIP GENERATION RATES PER OCCUPIED UNIT

Source	Land Use	Daily Trip Rate			AM Pk Hour	AM Peak Hour Trip Rate			PM Pk Hour	PM Peak Hour Trip Rate			Note
		Low	High	Ave	occurs between	Total	% of ADT	In % : Out %	occurs between	Total	% of ADT	In % : Out %	
Weekday													
ITE	Hotel	4.14	17.44	8.92	7-9 am	0.67	7.5%	58 : 42	4-6 pm	0.71	8.0%	49 : 51	*a*
ITE	Luxury Condo/Townhouse	1.83	11.79	5.86	7-9 am	0.56	9.6%	23 : 77	4-6 pm	0.55	9.4%	63 : 38	*a*
ITE	Recreational Home	3.00	3.24	3.16	7-9 am	0.16	5.1%	67 : 33	4-6 pm	0.26	8.2%	41 : 59	*a*
SANDAG	Hotel	9.00	11.90	10.50	7-9 am	0.63	6.0%	60 : 40	4-6 pm	0.84	8.0%	60 : 40	*b*
SANDAG	Condominium			8.00	7-9 am	0.64	8.0%	20 : 80	4-6 pm	0.80	10.0%	70 : 30	*b*
Transpo Group	Vacation Club	3.70	13.10	6.90									*c*
Weekday (Recommended)													
ITE & Higgins	Timeshare			8.31	7-9 am	0.62	7.5%	58 : 42	4-6 pm	0.66	8.0%	49 : 51	*e*
ITE	Luxury Condo/Townhouse	1.83	11.79	5.86	7-9 am	0.56	9.6%	23 : 77	4-6 pm	0.55	9.4%	63 : 38	*a*
ITE & Transpo	Vacation Club	3.70	13.10	6.90	7-9 am	0.35	5.1%	23 : 77	4-6 pm	0.57	8.2%	41 : 59	*f*
Saturday													
ITE	Hotel	7.07	13.86	10.50						0.87	8.3%		*a*
Transpo Group	Vacation Club	3.60	11.90	6.90									*c*
Higgins Assoc.	Timeshare			8.31	10-12 am	0.62	7.5%	62 : 38	4-6 pm	1.04	12.5%	46 : 54	*d*
Sunday													
ITE	Hotel	5.60	10.40	8.48						0.75	8.8%		*a*
Transpo Group	Vacation Club	3.90	8.80	6.30									*c*

Legend

a = Trip rates were obtained from Trip Generation, ITE, 6th edition, 1997.

b = Trip rates were obtained from Traffic Generators, SANDAG, December 1996.

c = Trip rates were calculated based on data collected by the Transpo Group at three World Mark Vacation Club facilities in 1995.

d = Trip rates were calculated based on data collected by Higgins Associates at San Luis Bay Inn, California in 1997.

e = San Luis Bay Inn is busiest on the weekend. For a conservative analysis, weekday trip rate at San Luis Bay Inn was assumed to be identical to the Saturday trip rate. Weekday AM and PM peak hour trip rates for San Luis Bay Inn were estimated by applying the ITE hotel's % of Daily and directional in/out split % to the San Luis Bay Inn weekday daily trip rate.

e = ITE's Recreational Home % of Daily and directional in/out split % were applied to the Transpo Group's daily trip rate to estimate the AM and PM peak hour trip generation rates for vacation club use.

Note

1. All trip rates presented above are vehicle trips per occupied room, not vehicle trips per room (occupied and vacant).
2. The national average room occupancy is 80% for Timeshares per "1990 Timeshare Report" by RCI Consulting, Inc.

EXHIBIT 3
TIMESHARE TRIP GENERATION RATES
BASED ON SURVEY DATA AT SAN LUIS BAY INN, CALIFORNIA

Time Period Starting	Time Period Ending	Driveway Count (vehicles) Total	In	Out	Hourly Total (vehicles) Total	In	Out	Trip Rate Per Occupied Unit Total	In : Out %	Out %
12 : 00 midnight	12 : 15 am	0								
12 : 15	12 : 30	0								
12 : 30	12 : 45	0								
12 : 45	1 : 00 am	0			0	0	0			
1 : 00 am	1 : 15	0			0	0	0			
1 : 15	1 : 30	1	1		1	1	0			
1 : 30	1 : 45	0			1	1	0			
1 : 45	2 00 am	2	2		3	3	0			
2 00 am	2 15	0			3	3	0			
2 15	2 30	1		1	3	2	1			
2 30	2 45	0			3	2	1			
2 45	3 00 am	0			1	0	1			
3 00 am	3 15	0			1	0	1			
3 15	3 30	0			0	0	0			
3 30	3 45	0			0	0	0			
3 45	4 00 am	0			0	0	0			
4 00 am	4 15	0			0	0	0			
4 15	4 30	0			0	0	0			
4 30	4 45	0			0	0	0			
4 45	5 00 am	0			0	0	0			
5 00 am	5 15	0			0	0	0			
5 15	5 30	0			0	0	0			
5 30	5 45	0			0	0	0			
5 45	6 00 am	0			0	0	0			
6 00 am	6 15	0			0	0	0			
6 15	6 30	0			0	0	0			
6 30	6 45	0			0	0	0			
6 45	7 00 am	2	1	1	2	1	1			
7 00 am	7 15	1	1		3	2	1			
7 15	7 30	1	1		4	3	1			
7 30	7 45	2	1	1	6	4	2			
7 45	8 00 am	3	3		7	6	1			
8 00 am	8 15	2	2		8	7	1			
8 15	8 30	2	1	1	9	7	2			
8 30	8 45	3	2	1	10	8	2			
8 45	9 00 am	1		1	8	5	3			
9 00 am	9 15	9	2	7	15	5	10			
9 15	9 30	4	2	2	17	6	11			
9 30	9 45	8	3	5	22	7	15			
9 45	10 00 am	8	3	5	29	10	19			
10 00 am	10 15	5	5		25	13	12			

EXHIBIT 3
TIMESHARE TRIP GENERATION RATES
BASED ON SURVEY DATA AT SAN LUIS BAY INN, CALIFORNIA

Time Period Starting	Time Period Ending	Driveway Count (vehicles) Total	In	Out	Hourly Total (vehicles) Total	In	Out	Trip Rate Per Occupied Unit Total	In : Out %	Out %
10 15	10 30	11	6	5	32	17	15			
10 30	10 45	11	6	5	35	20	15			
10 45	11 00 am	8	5	3	35	22	13			
11 00 am	11 15	9	8	1	39	25	14			
11 15	11 30	14	7	7	42	26	16	0.62	62 :	38
11 30	11 45	9	5	4	40	25	15			
11 45	12 00 pm	10	5	5	42	25	17			
12 00 pm	12 15	9	6	3	42	23	19			
12 15	12 30	16	6	10	44	22	22			
12 30	12 45	12	8	4	47	25	22			
12 45	1 00 pm	10	3	7	47	23	24			
1 00 pm	1 15	15	9	6	53	26	27	0.78	49 :	51
1 15	1 30	9	5	4	46	25	21			
1 30	1 45	6	4	2	40	21	19			
1 45	2 00 pm	10	6	4	40	24	16			
2 00 pm	2 15	18	15	3	43	30	13			
2 15	2 30	13	9	4	47	34	13			
2 30	2 45	20	8	12	61	38	23	0.90	62 :	38
2 45	3 00 pm	8	5	3	59	37	22			
3 00 pm	3 15	8	5	3	49	27	22			
3 15	3 30	14	8	6	50	26	24			
3 30	3 45	15	8	7	45	26	19			
3 45	4 00 pm	13	5	8	50	26	24			
4 00 pm	4 15	20	13	7	62	34	28			
4 15	4 30	15	13	2	63	39	24			
4 30	4 45	12	4	8	60	35	25			
4 45	5 00 pm	23	9	14	70	39	31			
5 00 pm	5 15	19	11	8	69	37	32			
5 15	5 30	17	9	8	71	33	38	1.04	46 :	54
5 30	5 45	9	5	4	68	34	34			
5 45	6 00 pm	11	5	6	56	30	26			
6 00 pm	6 15	8	4	4	45	23	22			
6 15	6 30	6	2	4	34	16	18			
6 30	6 45	6	3	3	31	14	17			
6 45	7 00 pm	4	1	3	24	10	14			
7 00 pm	7 15	6	3	3	22	9	13			
7 15	7 30	8	3	5	24	10	14			
7 30	7 45	2		2	20	7	13			
7 45	8 00 pm	6	1	5	22	7	15			
8 00 pm	8 15	4		4	20	4	16			
8 15	8 30	7	4	3	19	5	14			

EXHIBIT 3
TIMESHARE TRIP GENERATION RATES
BASED ON SURVEY DATA AT SAN LUIS BAY INN, CALIFORNIA

Time Period Starting	Time Period Ending	Driveway Count (vehicles) Total	In	Out	Hourly Total (vehicles) Total	In	Out	Trip Rate Per Occupied Unit Total	In : %	Out %
8 30	8 45	7	6	1	24	11	13			
8 45	9 00 pm	6	2	4	24	12	12			
9 00 pm	9 15	5	1	4	25	13	12			
9 15	9 30	8	4	4	26	13	13	0.38	50 :	50
9 30	9 45	3	2	1	22	9	13			
9 45	10 00 pm	5	3	2	21	10	11			
10 00 pm	10 15	0			16	9	7			
10 15	10 30	4	3	1	12	8	4			
10 30	10 45	4	1	3	13	7	6			
10 45	11 00 pm	5	1	4	13	5	8			
11 00 pm	11 15	4	1	3	17	6	11			
11 15	11 30	4	3	1	17	6	11			
11 30	11 45	2		2	15	5	10			
11 45 pm	12 00 midnight	2		2	12	4	8			
	Daily Total	**565**	**299**	**266**				**8.31 Trips/Unit**		

Note

1. Total Number of timeshare units = 68
2. Number of Occupied Units = 68 on Friday 9/12/97 and Saturday 9/13/97
3. Survey data was collected by Higgins Associates at the San Luis Bay Inn in Avila Beach, California for 24 hours from Friday midnight 9/12/97 to Saturday midnight 9/13/97.

TABLE 4
EXAMPLES OF TRIP RATES USED IN TRAFFIC STUDIES
TO DETERMINE TRAFFIC GENERATION OF TIMESHARE FACILITIES

Location	Name of Facility	Land Use	Size (Rooms or d.u.)	Daily Trip Rate per Occupied Unit	Source of Data and assumed Land Use Category	Study was Conducted By	Date of Study	On-Site Amenities
City of Marina, CA	Marina Dunes Resort	Hotel Vacation Club	70 112	8.70 10.16	ITE (hotel) ITE (resort hotel)	Higgins Associates	1996	*note 1*
City of Palm Desert, CA	Marriott Timeshare Condominiums	Timeshare	236	5.86	ITE (residential condominium)	ASL Consulting Engineers	1989	*note 2*
City of Lincoln City, OR	Gleneden Beach Vacation Club	Vacation Club	81	3.4	Survey data at Park Village, Leavenworth, WA	Transpo Group	1995	*note 3*
City of Sand City, CA	Sands of Monterey Resort	Hotel Timeshare Condominium	375 84 101	10.0		WSA	1988	*note 4*

Note

1. On-site amenities include conference and meeting rooms, full service quality restaurant, banquet facilities and coastal access facilities.
2. No amenities are available on-site. Marriott Timeshare occupants instead use on-site amenities at the Desert Springs Resort.
3. No public amenities, services or restaurant are available on-site.
4. On-site amenities include a 20,000 square foot conference center and retail shops, a 5,000 square foot restaurant, swimming pools and tennis courts.