

2025 Stroum Jewish Community Center Comprehensive Plan Map Amendment

Criteria Compliance Narrative

Thank you for your consideration of our Comprehensive Plan Map Amendment. The Stroum Jewish Community Center (“SJCC”) is proposing to redesignate the Future Land Use Map (“FLUM”) of the Mercer Island Comprehensive Plan from Single Family Residential (“R”) to Commercial Office (“CO”), for the following parcels:

- 2655500137
- 2655500136
- 2655500132
- small portion of 2655500115

Please see Exhibit A attached to this form for the redesignation map.

Per the application form, the following are answers as to how the proposed amendment meets the following codes:

- MICC 19.15.230¹
 - RCW Chapter 36.70A
 - Mercer Island Comprehensive Plan
 - Mercer Island City Policies
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1. MICC 19.15.230.E.

The proposed Comprehensive Plan Amendment was docketed by the City Council in December 2023.

2. MICC 19.15.230.F

F. Decisions to amend the comprehensive plan shall be based on the criteria specified below. An applicant for a comprehensive plan amendment proposal shall have the burden of demonstrating that the proposed amendment complies with the applicable regulations and decision criteria.

- 1. The amendment is consistent with the Growth Management Act, the countywide planning policies, and the other provisions of the comprehensive plan and city policies, and:**
 - a. There exists obvious technical error in the information contained in the comprehensive plan; or**

¹ Please note: the application checklist request “how the application meets the review criteria in MICC 19.15.260.” The criteria stated in 19.15.260 are procedural in nature and not appropriate for inclusion in the review narrative.

b. The amendment addresses changing circumstances of the city as a whole.

Yes. The proposal complies with MICC 19.15.230.F.1. First, it is consistent with the Growth Management Act, at Chapter 36.70A RCW. Most specifically, the amendment is “internally consistent” with the Comprehensive Plan, which is one of the main requirements of GMA (RCW 36.70A.070: “The plan shall be an internally consistent document and all elements shall be consistent with the future land use map”).

Second, it is consistent with the Countywide Planning Policies (“CPPs”), specifically the following (responses to CPPs in italics):

- FW-6: Enable culturally and linguistically appropriate equitable access to programs and services and help connect residents to service options, particularly for those most disproportionately cost-burdened or historically excluded. *The SJCC welcomes everyone, and connects the community to a wide variety of programs and services. The SJCC exists due to historical exclusion of Jewish people from other clubs and organizations on Mercer Island and elsewhere. The redesignation will allow the J’s work to continue on Mercer Island. The SJCC issues extensive scholarships so that anyone can participate in anything related to the J: Camp, Schwartz Early Childhood School, after-school care and programs, swim lessons, general membership, gardening, and any cultural arts event. The change to the CO zone allows SJCC to remain on the island in an appropriate designation/zone.*
- EN-3: Ensure public and private projects incorporate locally appropriate, low-impact development approaches developed using a watershed planning framework for managing stormwater, protecting water quality, minimizing flooding and erosion, protecting habitat, and reducing GHG emissions. *The redesignation will eventually allow for remodeling or rebuilding of the SJCC, which will be required to comply with then-current codes and regulations. This will benefit the environment.*
- EN-4: Encourage the transition to a sustainable energy future by reducing demand through efficiency and conservation, supporting the development of energy management technology, and meeting reduced needs from sustainable resources. *The redesignation will eventually allow for remodeling or rebuilding of the SJCC, which will be required to comply with then-current codes and regulations. This will benefit the environment.*
- DP-2: Prioritize housing and employment growth in cities and centers within the UGA, where residents have higher access to opportunity and high-capacity transit. *..the UGA will include a mix of uses that are convenient to and support public transportation to reduce reliance on SOV travel for most daily activities. The SJCC is the fifth largest employer on Mercer Island. The designation will ensure that this employment continues on the Island. In addition, the SJCC is extremely well-served by bike/trail infrastructure for alternative commuting methods.*
- DP-4: Develop and use...commercial land efficiently in the UGA to create healthy, vibrant, and equitable urban communities with a full range of urban services, by...b) encouraging compact and infill development with a mix of compatible residential,

commercial, and community activities...*The redesignation to a commercial designation allows the SJCC to remain on Mercer Island, providing a wide variety of needed community services to the Mercer Island community. The commercial designation is consistent with the existing and proposed use of the property, and would be an efficient use of commercially designated land. Given that the City recently took its own property out of CO, it makes sense to add additional CO land back to ensure compliance with job target and other Comp Plan policy goals surrounding jobs and employment (the CO zone is one of the main zones where businesses/jobs can be placed).*

- DP-6: Adopt land use and community investment strategies that promote public health and address racially and environmentally disparate health outcomes and promote access to opportunity. Focus on residents with the highest needs in providing and enhancing opportunities for employment, safe and convenient daily physical activity, social connectivity, protection from exposure to harmful substances and environments, and housing in high opportunity areas. *The redesignation allows the SJCC to remain and offer a variety of opportunities for daily physical activity and social connectivity for people of all ages, in a high opportunity area.*
- DP-8: Increase access to healthy and culturally relevant food in communities throughout the Urban Growth Area by encouraging the location of healthy food purveyors, such as grocery stores, farmers markets, urban agriculture programs, and community food gardens in proximity to residential uses and transit facilities, particularly in those areas with limited access to healthy food. *The SJCC includes a garden for fresh food production. Food grown in the garden is used in SJCC programs, donated to community food banks, and used to prepare food for those in need, like unhoused teens at YouthCare. The SJCC also regularly conducts food drives for both the broad and Kosher communities. It is in close proximity to alternative modes of transportation and is walkable to housing areas.*
- EC-2: Support economic growth that accommodates employment growth targets (see Table DP1) through local land use plans, infrastructure development, and implementation of economic development strategies. Prioritize growth of a diversity of middle-wage jobs and prevent the loss of such jobs from the region. *The SJCC is the fifth largest employer on Mercer Island. The designation will ensure that this employment continues on the Island. In addition, the SJCC is extremely well-served by bike/trail infrastructure for alternative commuting methods. In addition, the SJCC employs people of all ages and all stages of careers. The SJCC is often a teenager's first employer and many of these employees return for employment, either seasonal or permanent, for decades. The designation to CO protects hundreds of jobs that will be able to remain on the island.*
- EC-14: Celebrate the cultural diversity of local communities as a means to enhance social capital, neighborhood cohesion, the county's global relationships, and support for cultural and arts institutions. *The SJCC is the Puget Sound's most open and welcoming community-centered Jewish organization, creating opportunities that amplify profound Jewish connection for people of all ages. The designation to CO protects this Jewish cultural institution on Mercer Island, creating a space and place for anyone to experience Jewish culture, traditions, and education.*

- EC-26: Encourage commercial and mixed-use development that provides a range of job opportunities throughout the county to create a closer balance between the location of jobs and housing. *The SJCC is the fifth largest employer on Mercer Island. The redesignation will ensure that this employment continues on the Island. In addition, the SJCC is extremely well-served by bike/trail infrastructure for alternative commuting methods and is walkable to housing.*
- EC-29: Stabilize and prevent the economic displacement of small, culturally relevant businesses and business clusters during periods of growth, contraction, and redevelopment. Mitigate displacement risks through monitoring and adaptive responses. *The SJCC is the fifth largest employer on Mercer Island. The designation will ensure that this employment continues on the Island. In addition, the SJCC is extremely well-served by bike/trail infrastructure for alternative commuting methods. The designation to CO protects the SJCC and enables it to remain on Mercer Island.*
- PF-19: Locate schools, institutions, and other community facilities and services that primarily serve urban populations within the Urban Growth Area, where they are accessible to the communities they serve, except as provided in Appendix 5 (March 31, 2012 School Siting Task Force Report). If possible, locate these facilities in places that are well served by transit and pedestrian and bicycle networks. *The SJCC includes the Island's largest early childhood school and is extremely accessible to the families it serves. It also includes other child-related care and services including after-school care that includes transportation directly from schools, J Camp, teen programs, and a wide variety of other classes and activities that are geared toward education and children. The site is well served by alternative means of transportation as well as traditional means of transportation. The designation to CO is the more appropriate designation for the existing and proposed use, and allows the SJCC to remain in this location, which is specifically called for by the CPP.*

Third, the proposal is consistent with the Mercer Island Comprehensive Plan, specifically the following (responses to plan in italics):

The proposal serves the public interest and implements the following specific goals and vision of the city (responses to policies, where appropriate, in italics):

- Residential Community. Mercer Island is principally a single-family residential community supported by healthy schools, religious institutions, and recreational clubs. (Comp. Plan, Community Values). *The proposal will allow the SJCC, which is a school, afterschool care provider, summer camp organization, cultural arts producer, and a recreational club open to all, to continue to serve Mercer Island. The CO designation directly supports this Comprehensive Plan value—in fact, is the only organization on Mercer Island that does all of these things for anyone and everyone.*
- Education is the Key. The community and its public and private institutions are committed to provide excellence in Education (Comp Plan, Community Values). *The proposal allows the SJCC's Schwartz Early Childhood School to continue its excellent education of hundreds of young children on Mercer Island, after-school care for elementary students, and camp care for children four years old through their teens. SJCC also offers dozens of opportunities each month for adults to learn new skills,*

create with art, and explore curious subjects through the SJCC Arts + Ideas program. The CO designation directly supports this Comprehensive Plan value.

- Welcoming and Inclusive. Mercer Island is a place of acceptance where all are welcome, irrespective of race, ethnicity, national origin, religion, gender, sexual orientation, disability status, financial resources, or age. We believe that a diverse community is a healthier community. We respect and appreciate the benefits of diversity. *The SJCC's vision is to be the Puget Sound's most open and welcoming community-centered Jewish organization. The CO designation directly supports this Comprehensive Plan value.*
- Pride & Spirit, Excellence in Education, Recreational & Cultural Opportunities. Mercer Island will continue to provide a wide range of education, cultural, and municipal services for the community's varied population. Balanced and flexible programs will be necessary to meet the community's evolving needs in education, recreation, and cultural enjoyment. The community will maintain its broad range of quality basic services, including public safety, human services, physical development and utilities. At the same time, community leaders recognize that delivery of these services will take place in an arena of limited resources and heightened competition for tax revenues (Comp Plan, Values Manifested). *The SJCC provides a community center and educational, recreational, and cultural opportunities that are privately funded and do not burden the City's budget. The SJCC is the only Jewish Community Center in the state of Washington. It anchors Jewish community in the region, serves thousands of households on Mercer Island—Jewish and beyond—and is an irreplaceable asset to Island life, providing services and community connection that the City could not possibly replace. The CO designation directly supports this Comprehensive Plan value.*
- Residential, Environmental Stewardship, Leadership, Citizen Involvement, Neighborhood Pride. Civic, recreation, and religious organizations are important and integral elements of the community character and fabric. Their contribution and importance to the established community character should be reflected and respected in land use permit processes. (Comp Plan, Values Manifested). *The SJCC has been an important and integral part of the community for decades. This redesignation request will allow the SJCC to rebuild and reconfigure the SJCC to continue serving the community with modernized amenities, sustaining the benefits the community knows and expects from the J. We are hopeful that this request for redesignation is respectfully considered and approved, so that we can rebuild under the current CO zoning rules. The designation to CO directly supports this value.*
- Commercial Office and PBZ zones must serve the needs of the local population while remaining compatible with the overall residential character of the community. (Comp Plan, Land Use Issues, Outside the Town Center). *The Commercial Office zone, as developed in the future by the SJCC, will remain compatible and increase compatibility with the overall residential character of the community. Anything that is built will conform to CO standards. Finally, the proposal is adjacent to CO designations and extends them southward; this extension is consistent with good zoning and planning principles.*
- Goal 7.1 Preserve the neighborhood character in residential zones. For the purpose of implementing this element, neighborhood character only refers to the form, bulk, scale, and intensity of the built environment. (Comp Plan, Land Use Goals). *The proposal is*

consistent with this goal. The SJCC is a use that requires a gym and a pool, the larger scale of which is inconsistent with the desired scale identified in a single family zoning designation. Therefore, the designation should be changed, so that the SJCC can remain in this location. In addition, the designation to CO will require compliance with CO zoning, which includes significant protections of neighboring residential zones in terms of form, bulk, scale, light, and noise standards.

- Goal 7.4 Social and recreation clubs, schools, and religious institutions are predominantly located in single-family residential areas of the Island. The City may consider measures within the land use code to address the maintenance, updating, and renovation of these facilities, while ensuring compatibility with surrounding neighborhoods. Such facilities contribute to the mental, physical, and spiritual well-being of Mercer Island residents. Land use decisions should balance the retention of these facilities with overall community planning and zoning regulations (Comp Plan, Land Use Goals). *The City's current single family zoning regulations, and its issued formal interpretation of the regulations, do not allow variation from the gross square footage or impervious surface limitations currently placed on all structures in single family zones such that it is not possible for the SJCC to rebuild/remodel in place. The only sustainable option to retain the SJCC in this location is to redesignate to CO. The City has been very aware of this issue for many years now and has declined to make changes to its single family code that would accommodate the SJCC. Thus, a change to CO is necessary to allow the SJCC to move forward on Mercer Island.*
- Goal 7.5 Encourage compatible uses such as education, recreation, open spaces, government, social services, and religious activities (Comp Plan, Land Use Goals). *This goal of the Comprehensive Plan specifically encourages compatible uses such as the SJCC, which offers education, recreation, open space, and social services. As such, the Plan supports the redesignation to CO as the redesignation allows the SJCC to sustainably remain on the Island within a comp plan designation/zone that supports it.*
- Goal 9.2 Commercial uses and densities near the I-90 / East Mercer Way exit and SE 36th Street are appropriate for that area. All activities in the Commercial Office zone are subject to design review, and supplemental design guidelines may be adopted. *All SJCC uses are allowable uses in the CO zone. Any development proposal would be subject to design review. The CO designation is specifically called out in the comprehensive plan as being appropriate in this subarea.*
- Goal 10.6. Encourage low impact development approaches for managing stormwater and protecting water quality and habitat. *Any new development proposal will comply with current stormwater codes, which will benefit the environment. Designation to CO facilitates updated facilities and compliance with modern codes and practices, maintaining a safe, accessible, and operationally functional facility.*
- The commercial office land use designation represents commercial areas within Mercer Island, located outside of the Town Center, where the land use will be predominantly commercial office. Complementary land uses (e.g., healthcare uses, schools, places of worship, etc.) are also generally supported within this land use designation. *The SJCC fits within the description of this designation. The land and its uses are appropriate for designation to CO.*
- Transportation Goal 6.1: Ensure compatibility between transportation facilities and services and adjacent land uses, evaluating aspects such as: potential impacts of

transportation on adjacent land use; potential impacts of land development and activities on transportation facilities and services; and need for buffering and/or landscaping alongside transportation facilities. *While the designation of the property will change, the use will not change. The project-specific transportation review for any future SJCC project will analyze at a project-level transportation impacts, including concurrency review, that may be mitigated via trip reduction and physical improvements.*

- **Transportation Goal 9.2.** Address parking overflow impacts on neighborhoods caused by major traffic generators such as schools, businesses, parks, and multifamily developments. *The change to CO will allow the SJCC to better address parking issues. As an existing nonconforming building/site, the SJCC cannot change its footprint without triggering full compliance with the code, which would require compliance with the gross floor area and impervious surface limitations intended for single family homes which the SJCC cannot meet. As a result, the SJCC cannot address any existing parking issues. At the time of any future development proposal submittal, the SJCC would be required to comply with applicable parking requirements, which will address any potential parking issues.*

Finally, the proposal complies with the following provisions of MICC 19.15.230.F.1:

- a. There exists obvious technical error in the information contained in the comprehensive plan; or N/A; this is not a technical error.** *While we believe it is an error to include a non-single family use in a single family designation, when the City's zoning standards severely restrict the existing nonconformities, this is not correcting a technical error.*
- b. The amendment addresses changing circumstances of the city as a whole. Yes.** *The amendment is necessary due to the change in the single family zoning requirements that were passed in 2017. In 2017, the City limited the amount of gross floor area and impervious surface that could be built in all single family zones, without including an exception for rebuilds, expansions, and remodels of institutional uses like the SJCC. The City subsequently interpreted its code to limit permitted variances in single family zones. Thus, the SJCC - and many other vital community organizations on MI - are stranded in a zone that does not allow for the necessary rebuilding/remodeling to be present on the Island for another 50 years. As has been documented, the SJCC facilities are nearing the end of their useful life and the strict nonconforming provisions of the single family code cannot accommodate the needed remodel/refurbishing/renovation. Standards for community centers and the residential zones in which they sit have changed over the years, and significant change to the facility needs to occur so that it can attract members and sustain operations with facilities that meet modern environmental, safety, and accessibility standards. It is not possible to achieve this goal under the single family residential designation and zoning. It is therefore asking for the redesignation to CO to correct this issue so that it can be permitted to move forward with an appropriate*

redevelopment plan. These code changes have created a changed circumstance that applies to the city as a whole.

MICC 19.15.230.F.2

F.2. If the amendment is directed at a specific property, the following additional findings shall be determined: Yes. The proposal is compliant with 19.15.230.F.2:

a. The amendment is compatible with the adjacent land use and development pattern;

Yes. The SJCC has been on this property for over 50 years and the existing use is inherently compatible with the adjacent land use and development pattern; the SJCC is part of the existing land use and development pattern. There is no change proposed to the underlying use of the property. In addition, the proposal would simply extend the CO zone from the north to encompass the SJCC property. The adjacent designations (SF, B, CO, potentially PI) would not be impacted by the redesignation. Any future development proposal would be reviewed under the CO zone standards and would be subject to SEPA and development-level review at that time. Any use that is proposed under the CO zone would be required to comply with the CO zone standards, which include height, setback, and bulk standards to protect adjacent lower density zones.

b. The property is suitable for development in conformance with the standards under the potential zoning; and

Yes. The SJCC is an allowed use in the CO zone. The CO standards are suitable for any future rebuild or remodeling of the SJCC. The property itself is well-suited for redevelopment with the standards under the CO zoning, as it is a large enough parcel that can accommodate CO-permitted uses, and also accommodate the required large setbacks and landscaping buffers that are required by the CO zone.

c. The amendment will benefit the community as a whole and will not adversely affect community facilities or the public health, safety, and general welfare.

Yes. The amendment allows the SJCC to remain on the Island in its current location, as it has existed for the last 55+ years. As stated throughout this document, the SJCC is a very clear public benefit for the Island, with the largest early childhood school on the Island, the largest provider of swim lessons on the Island, and the fifth largest employer on the Island. The SJCC provides a place for people of all ages. It is committed to affordability and accessibility. It provides an antidote to the current loneliness epidemic. The redesignation to CO allows the SJCC to sustainably rebuild/remodel in place, which benefits all who ever use, or will use, the SJCC. The loss of the SJCC would be devastating to a large amount of people on Mercer Island. Aligning the designation of the property to the actual use, thereby facilitating a thriving use from a land use perspective, will have a positive, not adverse, effect on the public health, safety and welfare. In addition, the CO zone, as stated above, is protective of surrounding properties and regulates what can be built on the property, regardless of use. It requires large setbacks, landscape buffers, and other elements that result in no adverse effect on community facilities or the public health, safety, and general welfare.

3. Compliance with the Growth Management Act, chapter 36.70A.

Yes. The proposal is compliant with GMA, in particular the internal consistency requirement stated in RCW 36.70A.070. See above for additional information.

4. Compliance with the Countywide Planning Policies.

Yes. Please see above for the consistent CPPs (Item 2(F)(1.b))

5. Compliance with the Comprehensive Plan and City Policies.

Yes. Please see responses above for compliance.

Exhibit A Comp Plan Change Map

