

Dear Commissioners,

I am writing to formally object to the requested variance of use for 11910 Green Acres Lane. As a neighboring property owner directly impacted by this property, I respectfully submit the following comments addressing the approval criteria outlined in Section 5.3.4(C) of the El Paso County Land Development Code.

The applicant has not demonstrated a peculiar or exceptional hardship warranting a variance. The property's limitations—including rural zoning and access via private easements—are inherent characteristics of the parcel and surrounding area, not unique hardships. Instead, the request appears to be driven by a desire to operate a commercial enterprise in a zoning district where such use is not permitted.

The proposed use is inconsistent with the County's Master Plan and the intent of RR-5 zoning, which is to preserve low-density rural residential character. The subject property is located within the County's Large-Lot Residential placetype, which is explicitly intended to preserve a rural, low-density residential character consisting primarily of single-family homes on large lots. The Master Plan emphasizes a preservation of a rural aesthetic and environment, low-density residential use, minimal change to existing character, and only limited commercial uses that remain compatible with the surrounding area. The proposed use does not align with these guiding principles. A commercial-scale media production and administrative operation with staffing, logistics, and production activity does not align with this intent. Additionally, the Master Plan specifically calls for development that does not alter the essential rural character of the area. The ongoing and proposed use of this property has already introduced a level of activity and intensity that is inconsistent with that goal. For these reasons, the proposed variance is not consistent with the County's Master Plan and should not be approved.

The proposed use is not compatible with the surrounding rural residential neighborhood. The property is not functioning as a residence and, according to the applicant's own submission, no individual resides there. The intensity of use including staffing, production activity, and operational scale is fundamentally different from residential use and incompatible with the character of the area. The current and proposed use has already resulted in adverse impacts to nearby residents, including: Increased traffic on a narrow private easement not designed for commercial use, early morning activity beginning as early as 5:30–6:00 a.m., safety concerns related to vehicle volume and speed, commercial truck traffic, including repeated semi-truck deliveries. These conditions negatively affect the safety and livability of neighboring properties.

While the application characterizes the use as “low-impact,” actual conditions and documented activity demonstrate otherwise. Daily operations, employee traffic, and delivery activity exceed what would reasonably be expected in a residential zone. The scale and intensity of use are inconsistent with the representations made in the application.

The property has a history of commercial use inconsistent with its zoning designation. The structure itself was designed and used as a commercial facility and continues to function as such (<https://youtu.be/v-4netQ3P6s?si=BhUmCcbBYCERqI5B>). Granting a variance would legitimize an ongoing noncompliant use rather than address a true land-use hardship.

The applicant states that all off-site impacts have been addressed; however, significant impacts remain unresolved.

Green Acres Lane is a privately maintained road shared by neighboring property owners, who collectively fund and perform maintenance, including grading, snow removal, and repairs. The applicant has not contacted neighboring property owners to develop a plan for addressing increased road use or maintenance contributions. Increased commercial traffic including heavy vehicles has already caused additional wear, yet no mitigation plan has been proposed. Also, water rights are shared and evenly distributed among the subdivided parcels at 11750, 11910, and 11930 Green Acres Lane. The proposed commercial intensity of use will increase water demand beyond typical residential use. Despite indicating that discussions would occur, the applicant has not engaged neighboring property owners regarding how increased water usage will be addressed. This represents a significant unresolved impact on shared infrastructure. The property is accessed via a narrow, single-lane private easement crossing multiple privately owned parcels. This access was not designed for commercial traffic, cannot safely accommodate increased volume or heavy vehicles, and is creating safety and maintenance concerns for neighboring properties. Additionally, shared infrastructure including water supply and private roadways is not designed to support the intensity of the proposed use. The limitations of the access route raise concerns regarding: emergency vehicle access, road durability under commercial loads, and overall suitability of the site for non-residential use. These factors further demonstrate that the property is not appropriate for the proposed use.

The application presents the proposed use as a low-impact, indoor-only operation with minimal staff, no public access, and residential-level deliveries. However, this characterization is inconsistent with both observed activity and the applicant’s own statements. Specifically, the application states typical staffing of 6–8 employees, yet observed daily activity has ranged from approximately 10–20 individuals on-site. The organization publicly states on its website, “We currently have 40 full-time staff members, along with many wonderful volunteers,” which is

inconsistent with the significantly lower staffing levels represented in the Letter of Intent and raises concerns about the accuracy of the application. The application states no public events or gatherings, while public communications describe planned in-person events, guest appearances, and organized gatherings. The application limits deliveries to standard residential or box truck levels, yet semi-truck deliveries have occurred repeatedly, demonstrating an ongoing pattern of commercial-scale logistics activity inconsistent with the representations in the application. The application asserts that all off-site impacts have been addressed, despite no coordination regarding shared road maintenance or water usage. The application confirms that no individual resides on the property, indicating that the primary use is not residential in nature. These discrepancies raise serious concerns regarding the accuracy and completeness of the application and make it difficult to evaluate the true scope and long-term impact of the proposed use.

The applicant's materials and public communications make clear that the use of this property is not comparable to a typical home-based business or low-impact home occupation. Instead, it is a large-scale, multi-platform commercial and organizational operation with national and international reach. Publicly available statements from the organization demonstrate: A staffed operation, including a partner relations team of approximately 20 employees and broader organizational staffing. Distribution of nearly 20,000 physical products, including books, study materials, and media resources. Daily live broadcasts reaching approximately 15 million monthly views. Television production and distribution across multiple national networks. Management of over 100,000 annual calls through a dedicated call center function. Ongoing organizational expansion, including international operations and new program development. In addition, the organization explicitly describes plans for in-person gatherings and events, including: "In-studio intensives", Conferences and teaching events, Multi-day training programs with in-person components. These activities are not incidental; they are central to the organization's mission and operational model. This level of activity far exceeds what would reasonably be considered a home occupation of residential compatible use. Rather, it represents a high-intensity commercial operation involving staffing, production, logistics, distribution, and event hosting. The scale and intensity described by the applicant are fundamentally incompatible with a rural residential zoning district and cannot be reasonably supported by the site's limited access, shared infrastructure, and surrounding residential properties.

The information referenced in this letter is drawn directly from the organization's own publicly available materials, including official newsletters and video content describing their operations, scale, and future plans.

The following sources are provided for independent review:

1. YouTube Video: "TAKING YOU INSIDE THE NEW BUILDING!! Thank you Partners & Friends!"

<https://www.youtube.com/live/2uuGkRWYYTk?si=xlgRZxYp65FvGeG>

2. August 2025 Partner Newsletter

<https://josephz.com/august-2025-partner-newsletter/>

3. YouTube Video: "AUGUST UPDATE: ANNOUNCING THE NEW EXPANSION OF Z MINISTRIES! (Watch till the end)"

<https://www.youtube.com/live/BoTnYIETHSA?si=JZbfM8hke3dEUcBh>

4. 2025 Annual Partner Report (December Newsletter)

<https://online.flippingbook.com/view/358284967/>

5. October 2025 Partner Newsletter

<https://josephz.com/october-2025-partner-newsletter/>

The YouTube videos listed above are currently "unlisted." Unlisted videos are not visible on a public channel page, search results, or recommendations, but they are not private and can be viewed and shared by anyone with the direct link.

Moreover, the subject property has a documented history of zoning violations related to prohibited uses within the RR-5 (Residential Rural) zoning district.

The RR-5 district is explicitly intended to accommodate low-density, rural, single-family residential development. Commercial operations of the scale and nature currently occurring at this property are not permitted within this zoning designation. The applicant has been operating in a manner inconsistent with RR-5 zoning, resulting in multiple violations for prohibited use within the applicable zoning district. Currently, the property remains out of compliance and another notice of violation was issued March 19th, 2026

(<https://epcdevplanreview.com/Public/ProjectDetails/212085>).

Despite the pending variance request, commercial operations are ongoing. Daily activity includes employees reporting to the property and conducting business operations, including shipping and receiving functions, which are not permitted under current zoning. A variance of use is intended to address legitimate land-use hardships—not to retroactively legitimize ongoing

violations or allow continued noncompliance during the application process. Continued operation of a non-permitted commercial use while seeking approval raises serious concerns regarding adherence to County regulations and the applicant's willingness to comply with conditions if a variance were granted.

In conclusion, the variance of use criteria require that the proposed use be justified by hardship, compatible with the surrounding area, and not detrimental to neighboring properties or infrastructure. Based on direct observation and documented evidence, the proposed use at 11910 Green Acres Lane fails to meet multiple required criteria. The request does not address a legitimate hardship but instead seeks to permit a commercial operation in a location that is fundamentally incompatible with its zoning, access, and shared infrastructure. This is not a case of a small home-based business seeking reasonable accommodation, but rather a large-scale commercial enterprise seeking to operate in a location fundamentally unsuited for its scope and intensity. Additionally, inconsistencies between the application and actual and stated use raise significant concerns about the true scope and impact of the operation. The fact that the property is currently operating in violation of County zoning regulations further underscores the inappropriateness of granting this request. For these reasons, I respectfully request that the Board deny the variance of use application.

Thank you for your time and careful consideration.

Sincerely,

Vanessa Wolberg

P.S.

Here are some quotes from the mentioned annual report and newsletters:

“ the interactive new online courses we are developing, as well as upcoming in-studio intensives. Our new studios at the World Broadcast Center in Colorado Springs will be used for special gatherings to impart, teach, and prophesy. Special guests with expertise will join me for these events. Conferences, books, and more are a large part of our service...”

“The property includes a magnificent shipping area, several offices, [...] There is also an excellent and spacious podcast room. Most importantly, it has a massive area designated for our television and live broadcast set, which aligns perfectly with our plans and what we have been praying for.”

“Along with this remarkable growth in our book sales, we have also expanded our staff significantly, adding professionals in accounting, administration, media, shipping and receiving, and our valued partner call team. We currently have 40 full-time staff members, along with many wonderful volunteers”

“This new property sits on 5 acres, with an additional 5 acres connected to it that could potentially be used for future expansion. If the additional 5 acres align with our expansion goals, we will consider acquiring that land as well. For now, we are excited to move into this newly constructed building, which we believe was designed specifically for this ministry!”

“The addition of the new property is exciting, as it will provide the space our ministry needs to better accommodate our executive staff, employees, volunteers, product shipping, and media team.”

“My desire is to quickly finish our studio and building renovation, followed by acquiring additional land connected to our current property.”