

THIS IS A PROPOSED DRAFT SUBJECT TO COMMUNITY INPUT, LEGAL AND ADMINISTRATIVE REVIEW, AND WILL BE REPLACED BY THE FINAL PLAN ADOPTED BY THE CITY COUNCIL.

Northeast Sub-Region Extraterritorial Jurisdiction Plan

DRAFT



September 2026

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Section 1 – Introduction & Background

SA Tomorrow Comprehensive Plan

The **SA Tomorrow Comprehensive Plan (Comprehensive Plan)** is the City of San Antonio's (City) 25-year framework guiding future growth and development. Adopted by City Council in August 2016, the Comprehensive Plan addresses a broad range of topics including growth and city form, economic development, housing, environmental protection, cultural and historic preservation, transportation, and related issues. To ensure the Comprehensive Plan remains responsive to evolving community needs, the City's Planning Department launched an ongoing implementation effort focused on translating the Comprehensive Plan's policies into actionable planning tools.

SA Tomorrow Sub-Area Planning and Comprehensive Land Use Categories

The Planning Department is engaging with residents and area stakeholders to implement the SA Tomorrow Comprehensive Plan through the completion of 30 sub-area plans. The sub-area plans are intended to provide a more coordinated and intentional planning framework for identified geographic areas across the city. A central component of each sub-area plan is the Future Land Use Map, which identifies the desired land use patterns and character for each area. The City's Comprehensive Land Use Categories are defined in the Unified Development Code (UDC) (see UDC Section 35-A101. Definitions and Rules of Interpretation) and provide a consistent set of categories and definitions to be used across all the sub-area plans. These sub-area plans will collectively result in one comprehensive, citywide future land use map. To date, City Council has adopted 12 of the 30 sub-area plans.

Role of the Future Land Use Map in the Extraterritorial Jurisdiction (ETJ)

Within the City's Extraterritorial Jurisdiction (ETJ), the future land use map functions as a policy-guiding framework regarding growth and development patterns. While the ETJ future land use maps do not carry direct regulatory authority, they articulate the City's long-term vision for growth and development. They help align public investment, coordinate infrastructure planning, and provide expectations for landowners and developers in the City's ETJ. The primary purposes of future land use in the ETJ are to:

- Provide strategic guidance for future land use patterns
- Coordinate infrastructure planning and capital investment decisions
- Signal preferred development outcomes to landowners and developers
- Establish a policy foundation for future planning actions, even where annexation is uncertain

Although zoning regulations do not apply within the ETJ, development remains subject to several critical municipal reviews, particularly those related to subdivision platting, infrastructure standards, and the creation of special districts. These reviews are typically administered by the City's Development Services Department (DSD) and Planning Department, and in some cases,

require City Council action. Through these mechanisms, the City continues to play an important role in shaping development form, infrastructure design, and long-term growth patterns beyond its corporate limits.

Changes to Texas Statutes

Historically, Texas cities could annex unincorporated areas without landowner or voter consent. This authority has been substantially limited since 2017 due to changes in state law, including Senate Bill 6 (2017) and House Bill 47 (2019). As a result, most annexations now occur only by petition, election, or mutual agreement with property owners. Historically, planning in the ETJ allowed cities to regulate development in anticipation of future annexation. Following the 2017 and 2019 annexation reforms, the likelihood of future annexation declined substantially as cities now have limited annexation authority. Additionally, with the passing of Senate Bill 2038 (2023), cities must now release ETJ territory upon receipt of a valid request. For planners and policymakers, this places greater emphasis on voluntary agreements, interlocal coordination, and land use planning reflective of constrained municipal authority outside city limits.

Annexation and Growth Management Policy

In 2023, the City adopted an updated Annexation and Growth Management Policy as a component of the SA Tomorrow Comprehensive Plan. This policy guides efforts and actions regarding growth in areas adjacent to the City, specifically areas within its ETJ. Previously adopted in 2016, the policy was updated to not only address changes to state law but also establish growth strategies and evaluation criteria to manage development and infrastructure planning within San Antonio's ETJ.

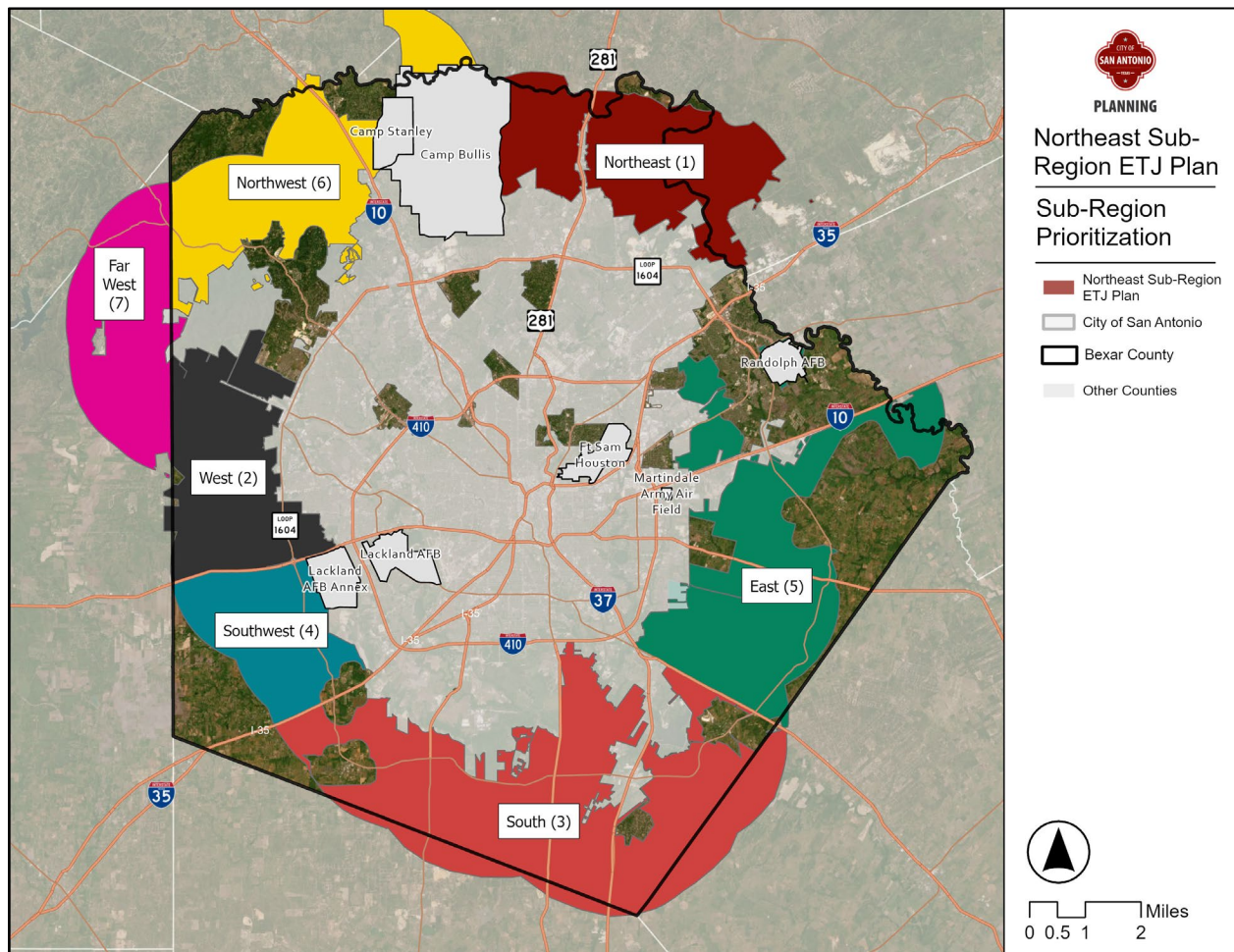
Sub-Region ETJ Planning Process

During development of the 2023 Annexation and Growth Management Policy, the Planning Department identified and prioritized seven sub-regions within the City's ETJ to guide future planning efforts. These sub-regions were delineated using a combination of quantitative data and planning considerations, including:

- Existing land use patterns
- Infrastructure availability and capacity
- Cultural assets and environmental features
- Population trends
- Employment and growth forecasts

Beginning with the Northeast Sub-Region, individual sub-regional ETJ plans will be developed to implement the City's Annexation and Growth Management Policy. Each sub-regional ETJ plan will be developed with detailed analysis and community input and will reflect feedback from coordination with City departments and external partner agencies.

Figure 1: Sub-Region Prioritization (Recommended Order)



Source: TXP, Inc.

Northeast Sub-Region ETJ Plan

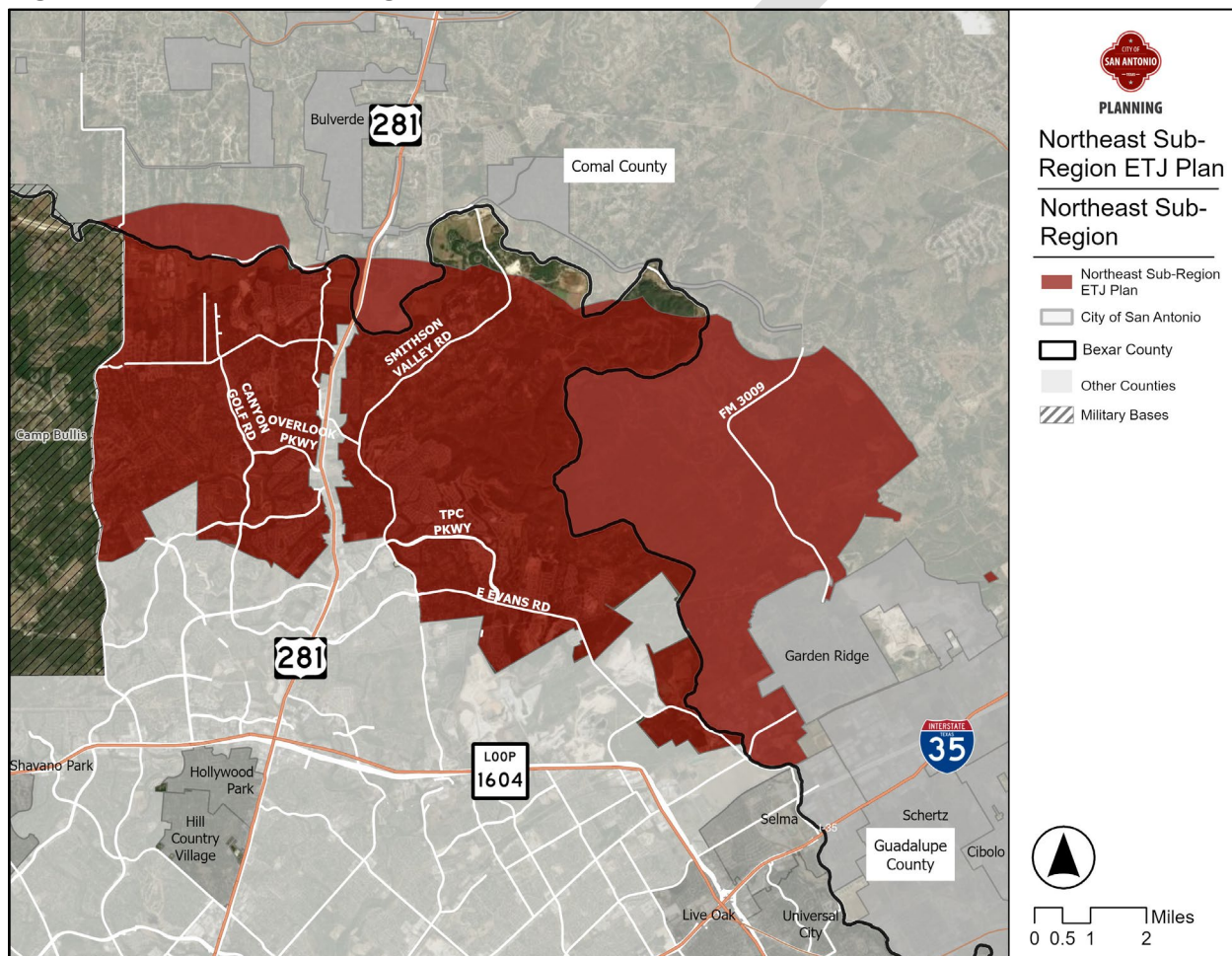
The City recognizes that each ETJ sub-region has distinct characteristics, development pressures, and environmental conditions. Accordingly, the Northeast Sub-Region ETJ Plan will address the land use, demographic trends, and physical context of the Northeast Sub-Region, while remaining consistent with the SA Tomorrow planning policies and land use categories.

The Northeast Sub-Region ETJ Plan will serve as a strategic planning document guiding future development within the region. Once adopted, the Northeast Sub-Region ETJ Plan will be a component of the SA Tomorrow Comprehensive Plan. Where the previously adopted North Sector Plan is contained within or partially overlaps the Northeast Sub-Region ETJ Plan, the Northeast Sub-Region ETJ Plan will be the plan of reference for future land use designations. Similarly, where the previous plan and the Northeast Sub-Region ETJ Plan have conflicting policies or priorities within the adopted boundary of the Northeast Sub-Region ETJ Plan, the Northeast Sub-Region ETJ Plan will be primary and control policy.

Northeast Sub-Region

The Northeast Sub-Region is in northern Bexar County and extends into portions of Comal and Guadalupe Counties. This sub-region covers approximately 51,930 acres and includes portions of the Edwards Aquifer Recharge Zone and Contributing Zone. Camp Bullis lies directly to the west, serving as a significant land use constraint. Much of the land along the US Highway 281 North corridor has already been annexed into the City, while other areas along the corridor are subject to non-annexation agreements. These agreements will expire within the next ten years, and those areas could possibly be annexed into the City.

Figure 2: Northeast Sub-Region



Source: TXP, Inc.

The Northeast Sub-Region contains more than 30,000 parcels of land, whose categories are divided by state property tax code and land use description, shown in Table 1. Single-family residential uses make up the largest share (84%), with approximately 26,000 parcels totaling about 13,800 acres. Large tracts of vacant ranch land and farm and ranch uses account for most of the remaining acreage, representing significant undeveloped areas. Additional uses

include vacant lots, commercial properties, utilities, and residential inventory, each covering comparatively smaller portions of the sub-region.

Table 1: Existing Land Use within the Northeast Sub-Region

State Code	Land Use Description	Parcels	Acres
A	Single Family Residential	25,883	13,814
B	Multi-Family Residential	18	254
C	Vacant Lot	2,358	4,460
D	Vacant Ranch Land Qualified	424	19,028
E	Farm And Ranch Improvements	574	9,117
F	Commercial And Industrial	270	2,452
J	Utilities	14	16
O	Residential Inventory	1,181	251
X	Totally Exempt Property	1	1
	Total	30,723	49,394

Source: Bexar Central Appraisal District (BCAD); Comal County Appraisal District (CCAD); TXP, Inc.

Section 2 – Existing Conditions

The factors that drive a real estate market tend to shift based on timeframe. In the near term, trends in the overall market environment assume disproportionate influence. For example, interest rates and underwriting requirements have a significant impact on what deals come to fruition. However, in the long run, capacity assumes greater importance as population/household formation and growth in the regional economy create demand, much of which will be localized in sub-regional markets. What follows is a review of recent overall market trends, followed by an overview of the elements expected to shape the outlook for the Northeast Sub-Region over time.

San Antonio Region Development Market Environment

Several national economic factors continue to shape near-term development conditions in the San Antonio region. Inflation remains above the Federal Reserve's long-term target, placing continued pressure on operating costs and household purchasing power. Labor shortages persist across several sectors and have been exacerbated by increased immigration enforcement, reducing labor availability in industries that traditionally rely on hourly and consumer facing workers. As a result, wage pressures remain elevated, particularly within service-oriented sectors. Recent geopolitical instability has also contributed to near-term increases in oil prices, further adding upward pressure on costs and inflation.

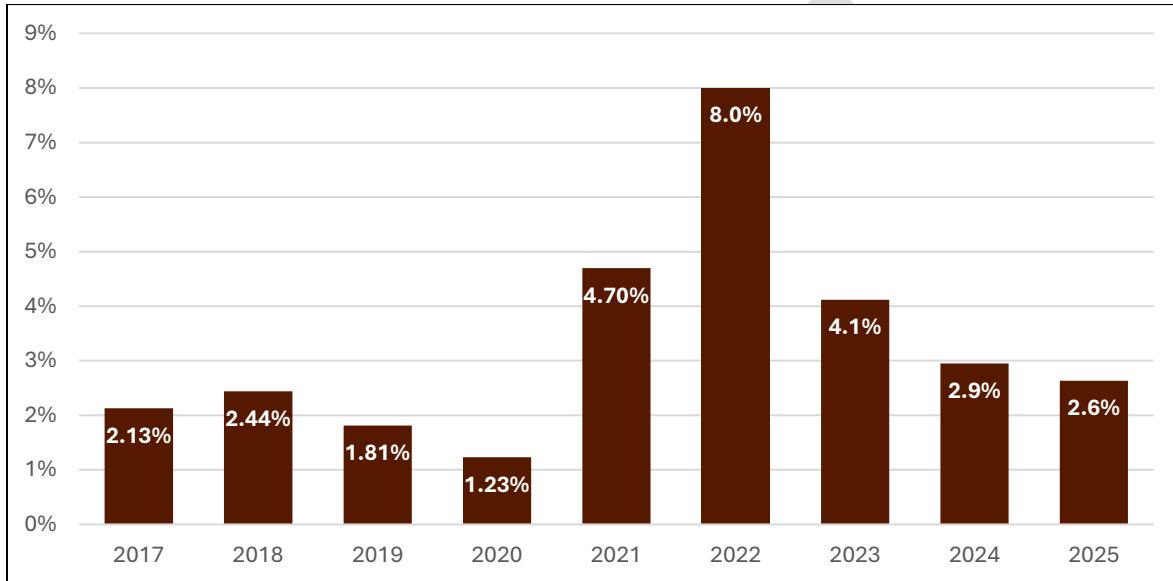
Construction costs remain elevated due to a combination of labor shortages, lingering supply chain constraints, and higher material prices. Additionally, the evolving implementation of tariffs has increased uncertainty, as their full economic effects may not yet be reflected in project budgets. These conditions continue to influence both capital investment decisions and the overall feasibility of new development.

Efforts to enact policies which materially stimulate development activity have not been sufficient. Market interest rates remain above 7%, increasing the cost of capital and complicating project financing. Lenders have also tightened underwriting standards, requiring higher equity contributions and more conservative financial assumptions. Together, these factors have slowed development activity nationally and locally. Commercial real estate market conditions remain uneven, with the office sector in particular continuing to face oversupply.

Within this broader national context, the San Antonio economy is beginning to moderate following a period of rapid growth. Consumer spending has softened as households respond to higher debt levels and increased economic uncertainty. City sales tax revenues grew by approximately 1.6% between 2024 and 2025, a rate below inflation at the time (see Figure 3), suggesting a slowdown in real consumer spending growth. At the same time, employment growth remains positive, though the rate has continued to slow.

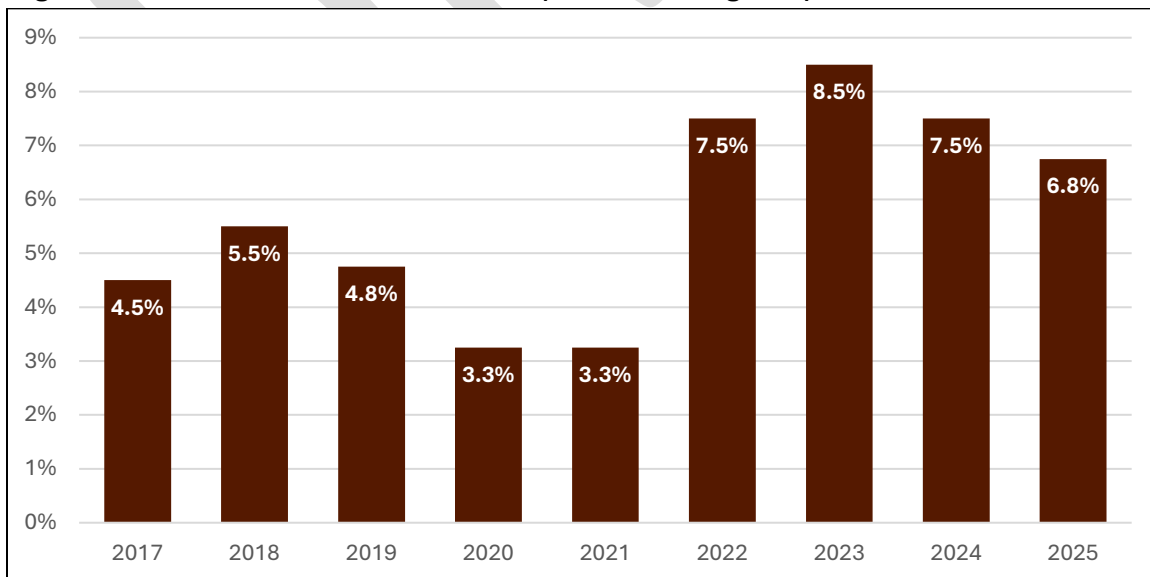
The figures that follow provide context on the external economic environment in which growth and development will occur in the Northeast Sub-Region. Consumer prices (inflation) and interest rates directly influence the cost of development, while regional job growth serves as an indicator of underlying real estate demand. Growth in the City's sales tax collections reflects local consumer spending and provides an additional demand proxy. Finally, measures of residential activity across the region offer insight into overall market conditions and development trends.

Figure 3: United States Consumer Price Index (CPI) Growth



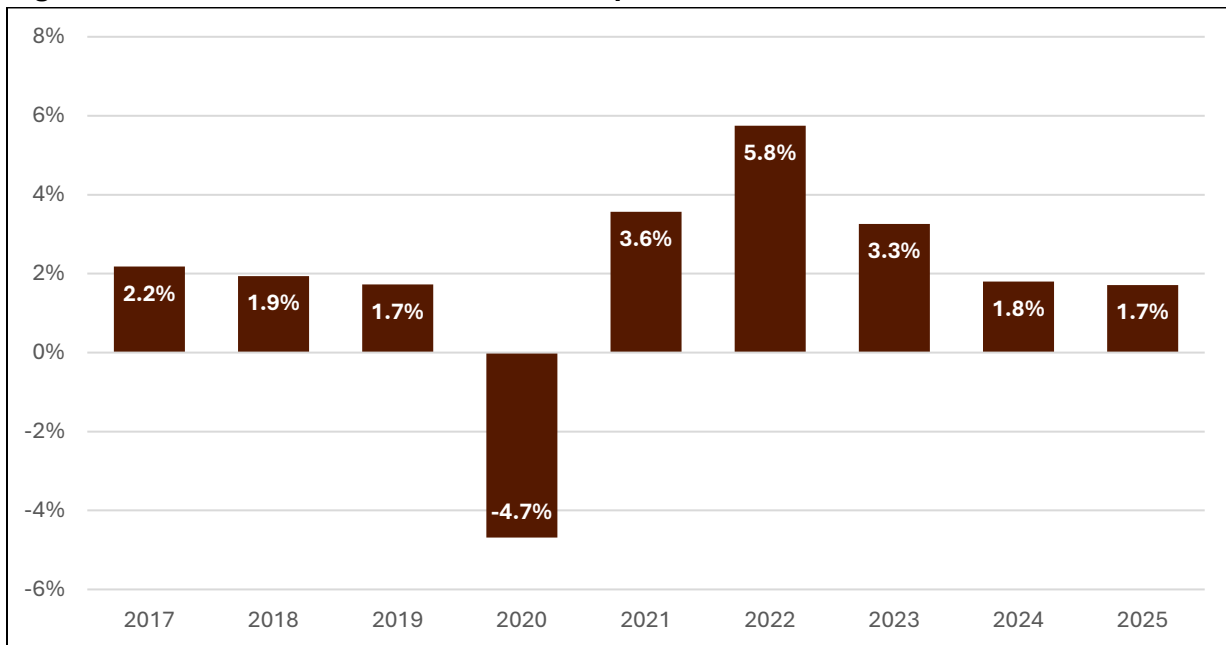
Sources: Bureau of Labor Statistics; TXP, Inc.

Figure 4: National Prime Interest Rate (December Figures)



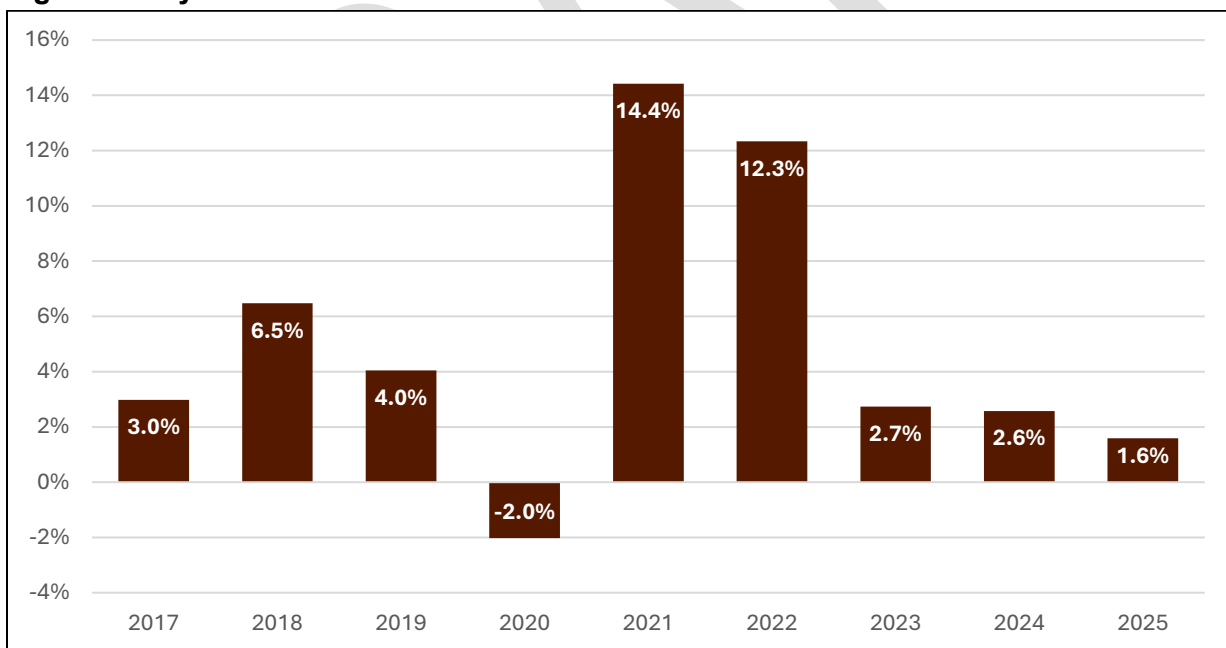
Sources: Bankrate; TXP, Inc.

Figure 5: San Antonio-New Braunfels Metropolitan Statistical Area Job Growth



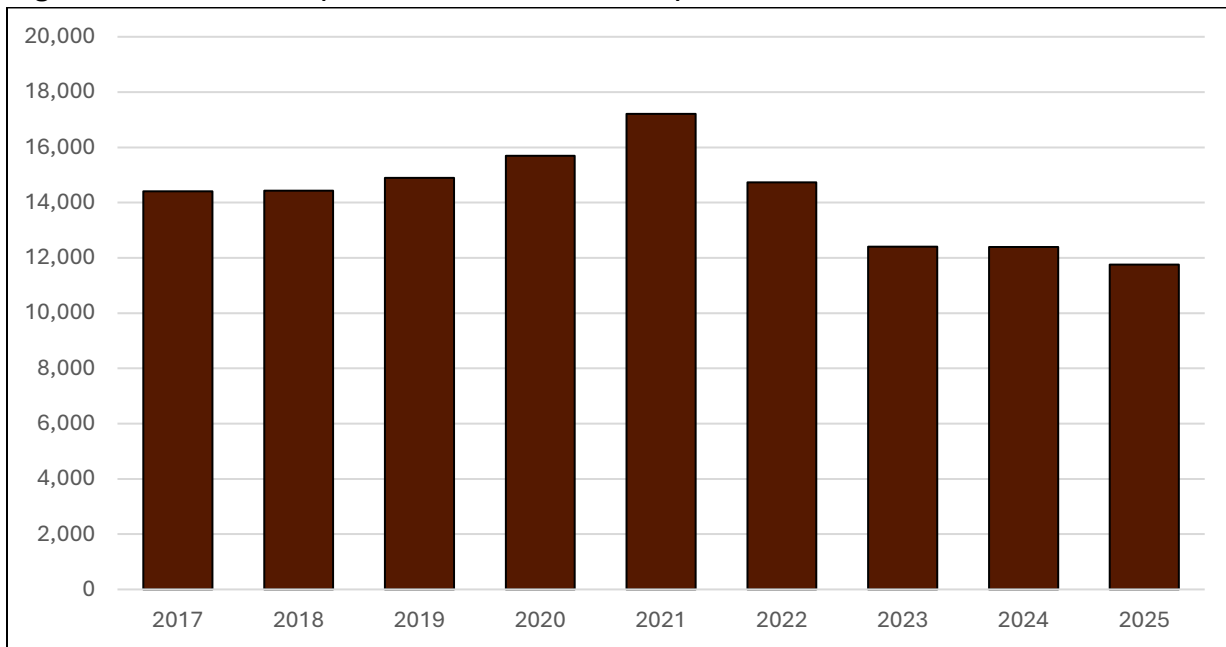
Sources: Bureau of Labor Statistics; TXP, Inc.

Figure 6: City of San Antonio Sales Tax Growth



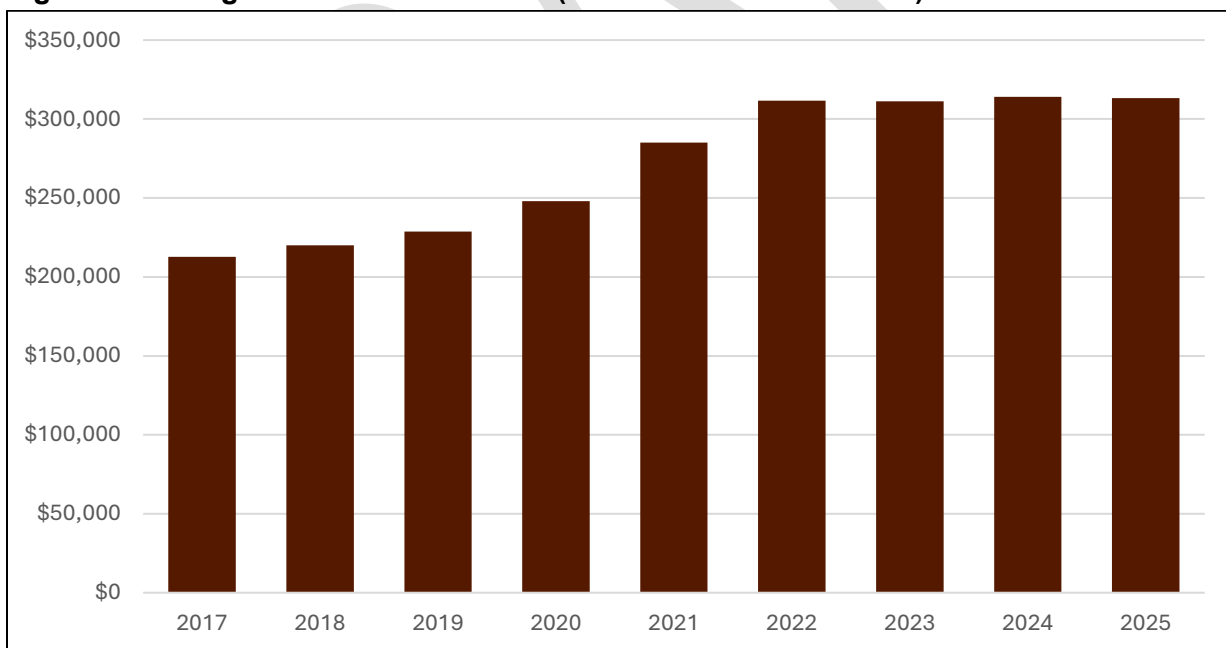
Sources: Texas Comptroller; TXP, Inc.

Figure 7: Homes Sold (San Antonio Market Area)



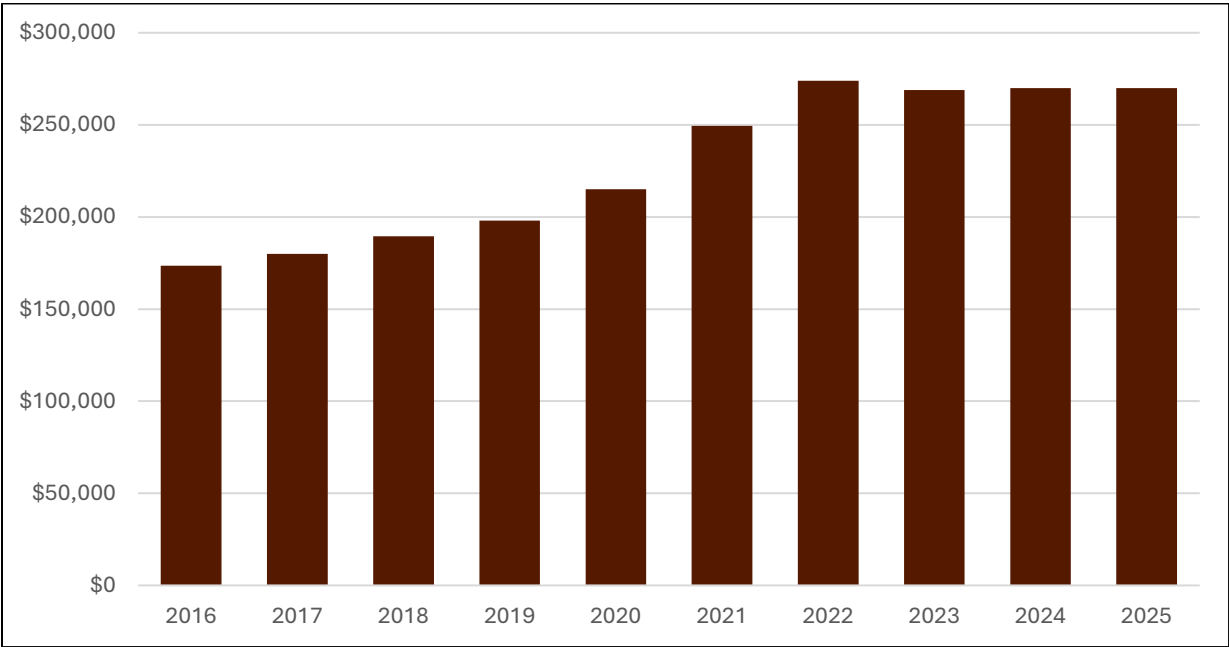
Sources: Texas A&M University – Texas Real Estate Research Center; TXP, Inc.

Figure 8: Average Price of Homes Sold (San Antonio Market Area)



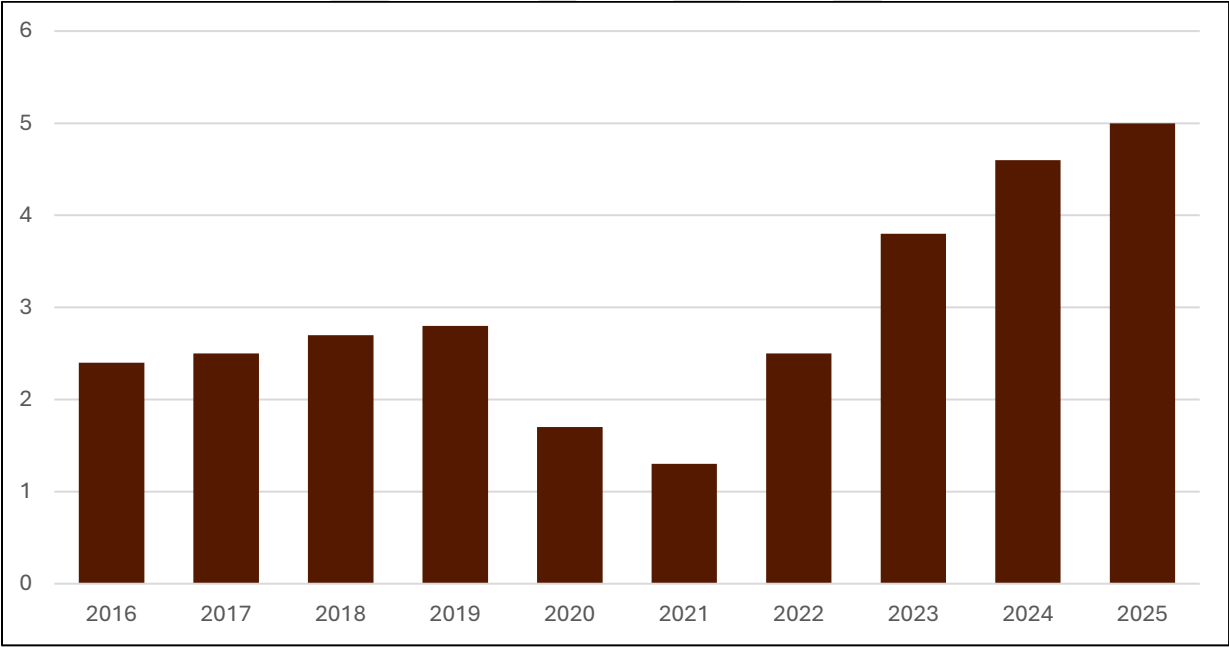
Sources: Texas A&M University – Texas Real Estate Research Center; TXP, Inc.

Figure 9: Median Price of Homes Sold (San Antonio Market Area)



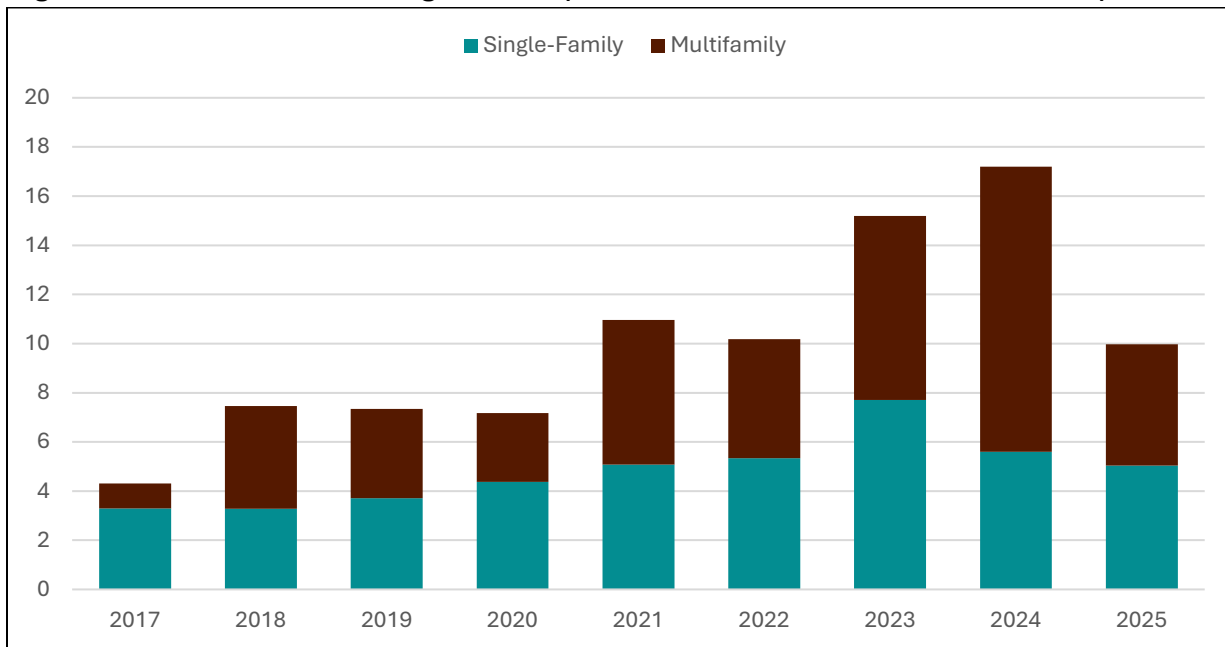
Sources: Texas A&M University – Texas Real Estate Research Center; TXP, Inc.

Figure 10: Months of Available Housing Inventory (San Antonio Market Area)



Sources: Texas A&M University – Texas Real Estate Research Center; TXP, Inc.

Figure 11: Residential Building Permits (San Antonio Market Area – 000s Units)



Sources: Texas A&M University – Texas Real Estate Research Center; TXP, Inc.

Northeast Sub-Region Market Environment

As the Northeast Sub-Region continues to develop and build out, it is important to understand how its demographic and economic profile differs from San Antonio overall. Rapid population growth, comparatively high household incomes, and commercial growth along US Highway 281 North are the major drivers of activity in this area. The existing conditions analysis evaluates demographic and economic trends for the area and compares them to citywide figures.

The Northeast Sub-Region spans portions of both Bexar and Comal counties. During the preparation of this assessment, several large tracts in Comal County petitioned to be released from the San Antonio's ETJ. As a result, it is likely that the eastern portion of the Sub-Region will shrink over time, reducing the area subject to San Antonio's long-term planning and subdivision authority.

Population

The Northeast Sub-Region has grown rapidly over the last 15 years with its population increasing from 42,296 residents in 2010 to an estimated 83,222 residents in 2025. This represents an increase of approximately 96.8% over this period. The area is projected to continue growing with population expected to reach 90,452 residents by 2030.

By comparison, San Antonio has grown at a more moderate pace. The City's population increased from 1,326,182 residents in 2010 to an estimated 1,450,229 residents in 2025, representing an increase of approximately 9.4%. Continued growth is projected with the city's population expected to reach 1,472,091 residents by 2030. While citywide growth remains steady, it is substantially slower than the rapid expansion observed in the Northeast Sub-Region.

Table 2: Population Trends

	2010	2025	2030
Northeast Sub-Region	42,296	83,222	90,452
City of San Antonio	1,326,182	1,450,229	1,472,091

Source: Environmental Systems Research Institute (Esri); TXP, Inc.

Households

The Northeast Sub-Region has a larger average household size than San Antonio as a whole. Average household size in the sub-region is estimated at 2.93 persons per household (2025), reflecting a higher concentration of family households. This household profile is consistent with the sub-region's status as a suburban residential area attracting families and established households.

San Antonio has a smaller average household size of 2.51 persons per household (2025). This reflects a greater share of renter occupied units, multi-family housing, and single person or nonfamily households across the city.

Table 3: Households (2025)

	Households	Avg. HH Size
Northeast Sub-Region	28,362	2.93
City of San Antonio	566,012	2.51

Source: Environmental Systems Research Institute (Esri); TXP, Inc.

Median Age

The Northeast Sub-Region has an older population than the city overall. The median age in the sub-region is estimated at 38.3 years (2025). The age profile is consistent with the area’s development pattern which has attracted families and higher-income households seeking newer housing and suburban amenities.

San Antonio has a younger age profile than the Northeast Sub-Region. The city’s median age is estimated at 35.9 years (2025), reflecting a broader mix of households. While San Antonio’s population is gradually aging, the city continues to maintain a relatively young median age compared to many large U.S. cities.

Table 4: Median Age Trends

	2010	2025	2030
Northeast Sub-Region	36.0	38.3	38.4
City of San Antonio	33.6	35.9	37.1

Source: Environmental Systems Research Institute (Esri); TXP, Inc.

Housing Units

The Northeast Sub-Region has experienced rapid growth in housing units over the past decade, largely driven by new single-family construction and master planned communities. As a result, the housing stock is predominantly owner-occupied, with approximately 78% of occupied units being owner-occupied in 2025. There is a relatively small share of renter-occupied units (17%) in the sub-region. Housing units in the sub-region are generally newer and have higher median home values than the citywide average.

By comparison, San Antonio has a more balanced housing profile. Approximately 53% of occupied housing units are owner-occupied, while a substantially larger share of units are renter-occupied as compared to the Northeast Sub-Region. These figures reflect the city’s higher concentration of multi-family housing, older housing stock, and broader range of housing types and price points.

Table 5: Housing Units (2025)

	Housing Units	Owner-Occupied	Renter-Occupied	Vacancy
Northeast Sub-Region	30,004	77.6%	17.0%	5.5%
City of San Antonio	622,919	53.5%	46.5%	9.1%

Source: Environmental Systems Research Institute (Esri); TXP, Inc.

Educational Attainment

Approximately 67% of adult residents in the Northeast Sub-Region have an associate degree or higher compared to 40.8% in the city overall. Conversely, there are 12.7% with a high school diploma or equivalent and 2.5% with less than a high school diploma in the sub-region; compared to 26.6% and 13.7%, respectively, in San Antonio.

Table 6: Educational Attainment (2025)

	Northeast Sub-Region	San Antonio
Less than 9 th Grade	1.4%	6.4%
9 th –12 th Grade, No Diploma	1.1%	7.3%
High School Graduate	10.4%	21.6%
GED/Alternative Credential	2.3%	5.0%
Some College, No Degree	17.7%	19.1%
Associate Degree	8.9%	9.7%
Bachelor's Degree	35.2%	19.0%
Graduate/Professional Degree	22.9%	12.1%

Source: Environmental Systems Research Institute (Esri); TXP, Inc.

Labor Force Participation

Labor market indicators suggest strong employment conditions within the Northeast Sub-Region. The unemployment rate is estimated at 2.4% compared to 4.4% citywide. This difference is consistent with the sub-region's higher median household incomes.

Table 7: Labor Force Participation (2025)

	Civilian Population 16+	Employed Share	Unemployment Rate
Northeast Sub-Region	46,554	97.6%	2.4%
City of San Antonio	766,658	95.6%	4.4%

Source: Environmental Systems Research Institute (Esri); TXP, Inc.

Wages and Income

Income and housing indicators highlight a substantial socioeconomic contrast between the Northeast Sub-Region and San Antonio. Median household income in the sub-region is estimated at \$134,644 compared to \$65,316 citywide.

Table 8: Wages and Income (2025)

	Median HH Income	Per Capita Income
Northeast Sub-Region	\$134,644	\$58,217
City of San Antonio	\$65,316	\$34,767

Source: Environmental Systems Research Institute (Esri); TXP, Inc.

Employment

Based on Longitudinal Employer-Household Dynamics (LEHD) workplace data from the U.S. Census Bureau, the Northeast Sub-Region contained 4,673 jobs in 2010 and 8,536 jobs in 2023. In comparison, the LEHD workplace data shows that the City had 623,153 jobs in 2010 and 826,947 jobs in 2023. This translates to an 82.7% increase in employment in the Northeast Sub-Region between 2010 and 2023; significantly higher than the 32.7% increase in San Antonio during that same time period.

Table 9: Employment Trends (Number of Jobs)

	2010	2020	2023
Northeast Sub-Region	4,673	6,106	8,536
City of San Antonio	623,153	743,736	826,947

Source: U.S. Census Bureau - Longitudinal Employer-Household Dynamics; TXP, Inc.

Based on private sector business data, two employers, JW Marriott San Antonio Hill Country Resort & Spa and V.K. Knowlton Construction & Utilities, Inc., account for almost 74% of the tracked number of private employees in the Northeast Sub-Region.

Table 10: Top 10 Private Sector Businesses in the Northeast Sub-Region

Rank	Employer	Employees
1	JW Marriott San Antonio Hill Country Resort & Spa	1,000
2	V.K. Knowlton Construction & Utilities, Inc.	380
3	Vintage Air, LLC	70
4	Constellation Brands, Inc.	67
5	OnPointPlus, LLC	51
6	Novavis International, LLC	65
7	Signature Travel	63
8	Wave Technologies, LLC	60
9	Technos, Inc.	60
10	Crypto Global Logistics LLC	59

Source: Data Axle; TXP, Inc.

The top three industry sectors in the Northeast Sub-Region are Construction (24.4%), Accommodation and Food Services (15.5%), and Professional, Scientific, and Technical Services (10.3%), while the top three industry sectors in the city are Health Care and Social Assistance (18.1%), Accommodation and Food Services (11.1%), and Retail Trade (10.5%).

Table 11: Employment by Major Industry Sector (2023)

NAICS* Sector	Northeast Sub-Region		San Antonio	
	No.	%	No.	%
Agriculture, Forestry, Fishing and Hunting	22	0.3%	462	0.1%
Mining, Quarrying, and Oil and Gas Extraction	15	0.2%	2,224	0.3%
Utilities	4	0.1%	6,165	0.8%
Construction	2,086	24.4%	40,487	4.9%
Manufacturing	304	3.6%	40,659	4.9%
Wholesale Trade	405	4.7%	29,991	3.6%
Retail Trade	319	3.7%	86,995	10.5%
Transportation and Warehousing	372	4.4%	30,624	3.7%
Information	105	1.2%	18,086	2.2%
Finance and Insurance	164	1.9%	65,918	8.0%
Real Estate and Rental and Leasing	185	2.2%	13,431	1.6%
Professional, Scientific, and Technical Services	883	10.3%	55,344	6.7%
Management of Companies & Enterprises	16	0.2%	14,911	1.8%
Administration & Support, Waste Management and Remediation	515	6.0%	62,142	7.5%
Educational Services	104	1.2%	62,522	7.6%
Health Care and Social Assistance	742	8.7%	149,629	18.1%
Arts, Entertainment, and Recreation	613	7.2%	15,075	1.8%
Accommodation and Food Services	1,325	15.5%	91,604	11.1%
Other Services	357	4.2%	21,392	2.6%
Public Administration	0	0.0%	19,286	2.3%
Total All Jobs	8,536	100.0%	826,947	100.0%

Source: U.S. Census Bureau - Longitudinal Employer-Household Dynamics; TXP, Inc.

*North American Industry Classification System (NAICS)

Non-Annexation Agreements

A non-annexation agreement is a legally binding contract between a city and property owner(s) or developer(s) of land in the City's Extraterritorial Jurisdiction (ETJ). In exchange for the City delaying full-purpose annexation and the collection of municipal property taxes, residents agree to comply with specific City regulations and waive protest of future annexation. Along the US Highway 281 North corridor, three primary non-annexation agreements shape long-term growth, service delivery, and annexation timing:

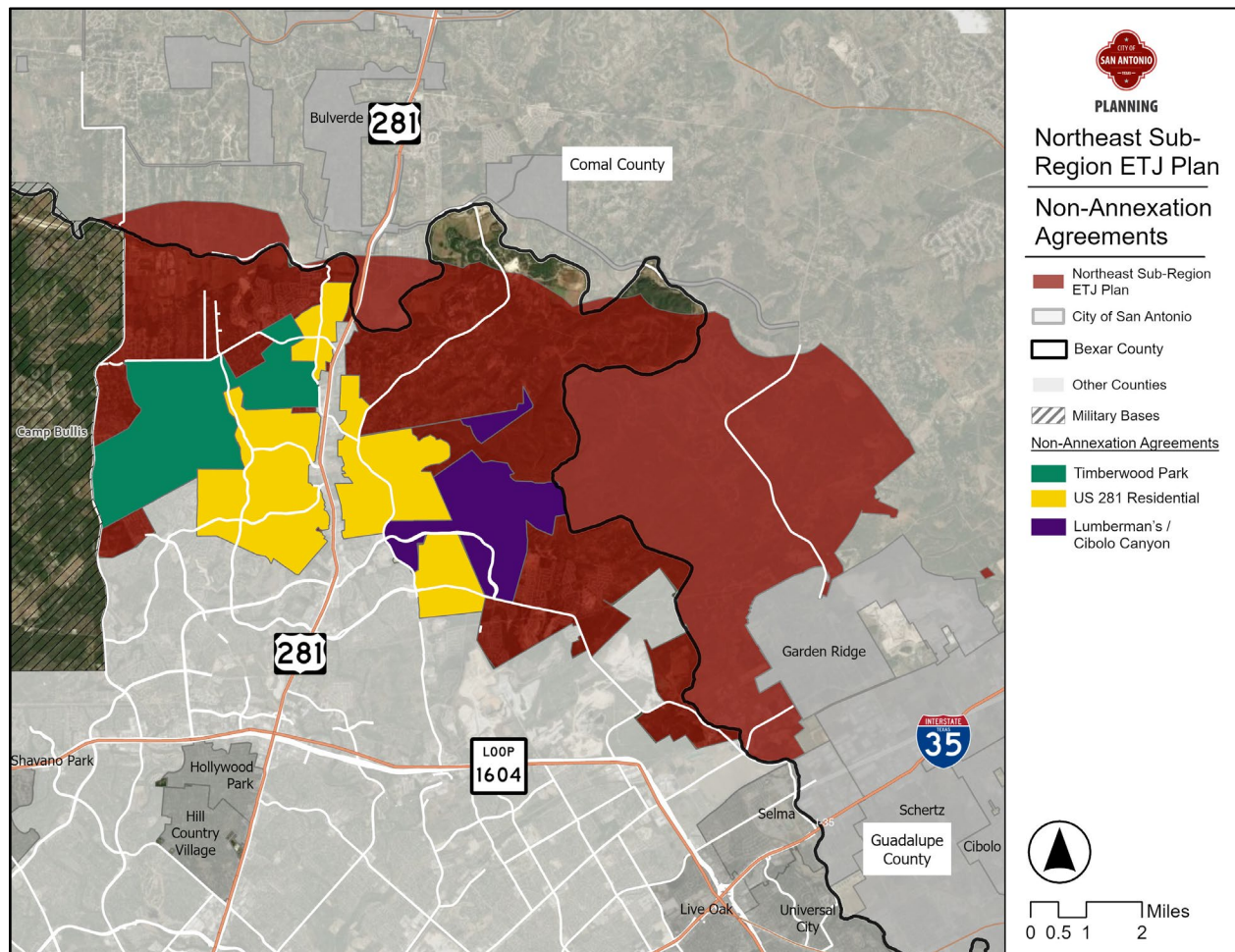
Timberwood Park Agreement - Covering approximately 4,345 acres west of US Highway 281 North, this agreement is for one of the largest established residential communities in northern Bexar County. The contract was executed following a period of limited-purpose annexation and defers full-purpose annexation to 2033.

US 281 Highway North Residential Area Agreement - This agreement covers approximately 11 square miles and includes roughly 24 major residential subdivisions. The agreement keeps these neighborhoods within San Antonio's ETJ until 2033.

Lumbermen's Investment Corporation / Cibolo Canyons Public Improvement District (PID) Agreement - This agreement covers the Cibolo Canyons development, home to the TPC San Antonio golf course and the JW Marriott San Antonio Hill Country Resort & Spa located east of US 281 Highway North. This agreement manages more than 2,800 acres, including a conservation easement. The Cibolo Canyons PID was established to finance public infrastructure and roads for this development. The Cibolo Canyons land is deferred from full-purpose annexation until January 2034, to align with the broader corridor's annexation schedule.

Upon expiration of these non-annexation agreements, the San Antonio City Council must evaluate whether to proceed with annexation. The City is not legally obligated to annex these areas at that time. If the City Council elects to move forward, annexation may occur only through adoption of a formal annexation ordinance, consistent with applicable state law, and City procedures.

Figure 12: Non-Annexation Agreements



Source: Bexar Central Appraisal District (BCAD); TXP, Inc.

Edwards Aquifer

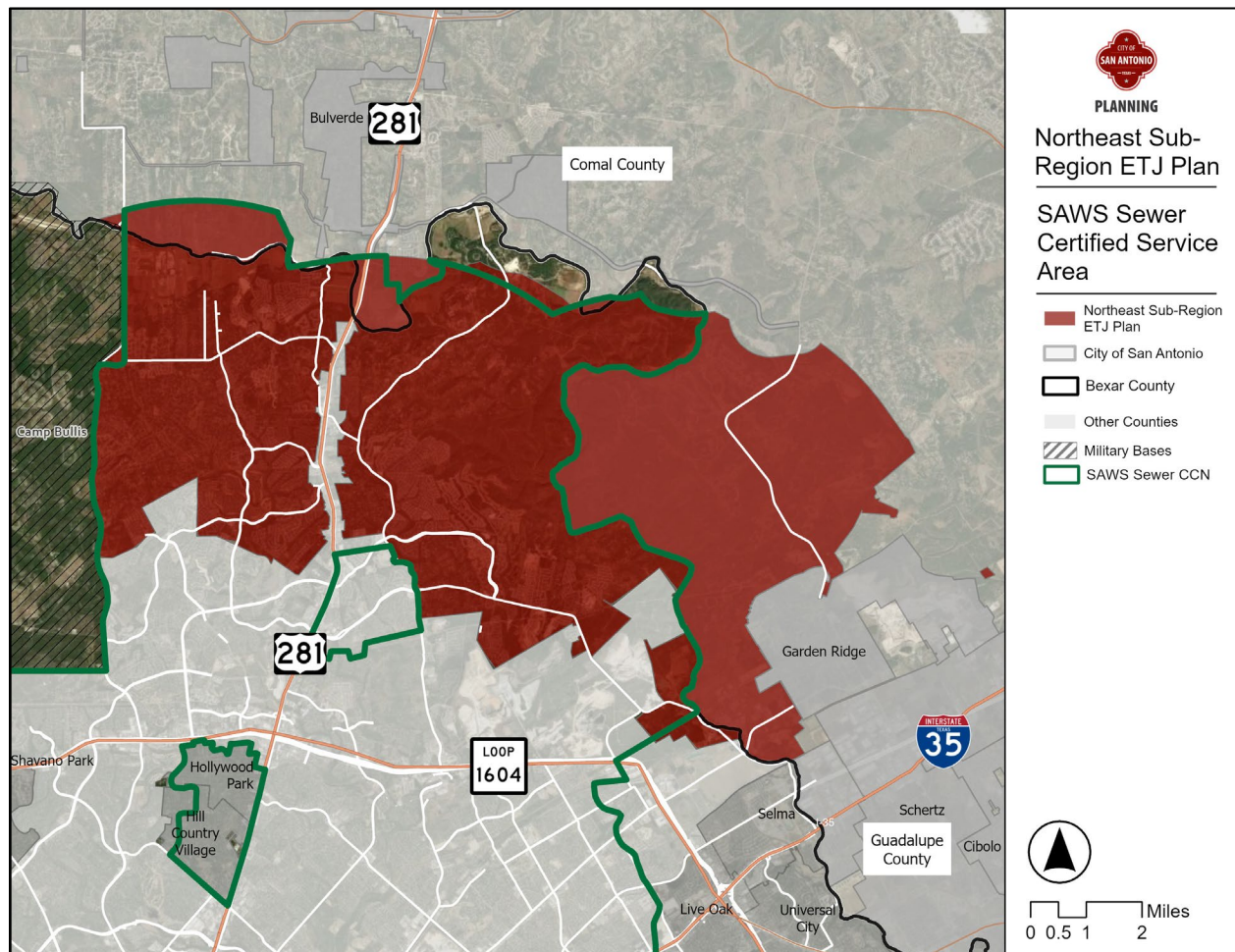
Portions of the Northeast Sub-Region overlie the Edwards Aquifer, which provides San Antonio with an abundant source of groundwater. The aquifer is divided into three main zones – the contributing zone, the recharge zone, and the artesian zone – and development over it is subject to enhanced environmental protections intended to safeguard regional water quality and supply. Development must comply with state-level Edwards Aquifer Protection Program (EAPP) requirements administered by the Texas Commission on Environmental Quality (TCEQ) and local Aquifer Protection Ordinance standards enforced by the City and San Antonio Water System (SAWS). Regulations generally limit impervious cover, require aquifer protection plan approval prior to construction, prohibit or tightly control activities near significant recharge features, and impose buffer zones along floodplains and karst features to reduce the risk of contaminated runoff entering the aquifer. Within the City's ETJ, impervious cover limits can be more restrictive than within city limits, and certain commercial and industrial uses are subject to additional controls or outright prohibitions.

Utility and Emergency Services

SAWS and CPS Energy currently provide most of the water, wastewater/sewer, electric, and gas service within the Northeast Sub-Region and are expected to remain the primary utility providers over the long term. SAWS serves most areas within San Antonio's incorporated limits, as well as most of its unincorporated area in the ETJ. In the Northeast Sub-Region, water service is supplemented by a limited number of smaller water supply corporations and utility districts. SAWS has selectively reduced portions of its sewer certified service area in Comal County through a partial decertification process, allowing other providers to serve specific areas. CPS Energy provides electric and gas service across both incorporated and unincorporated areas.

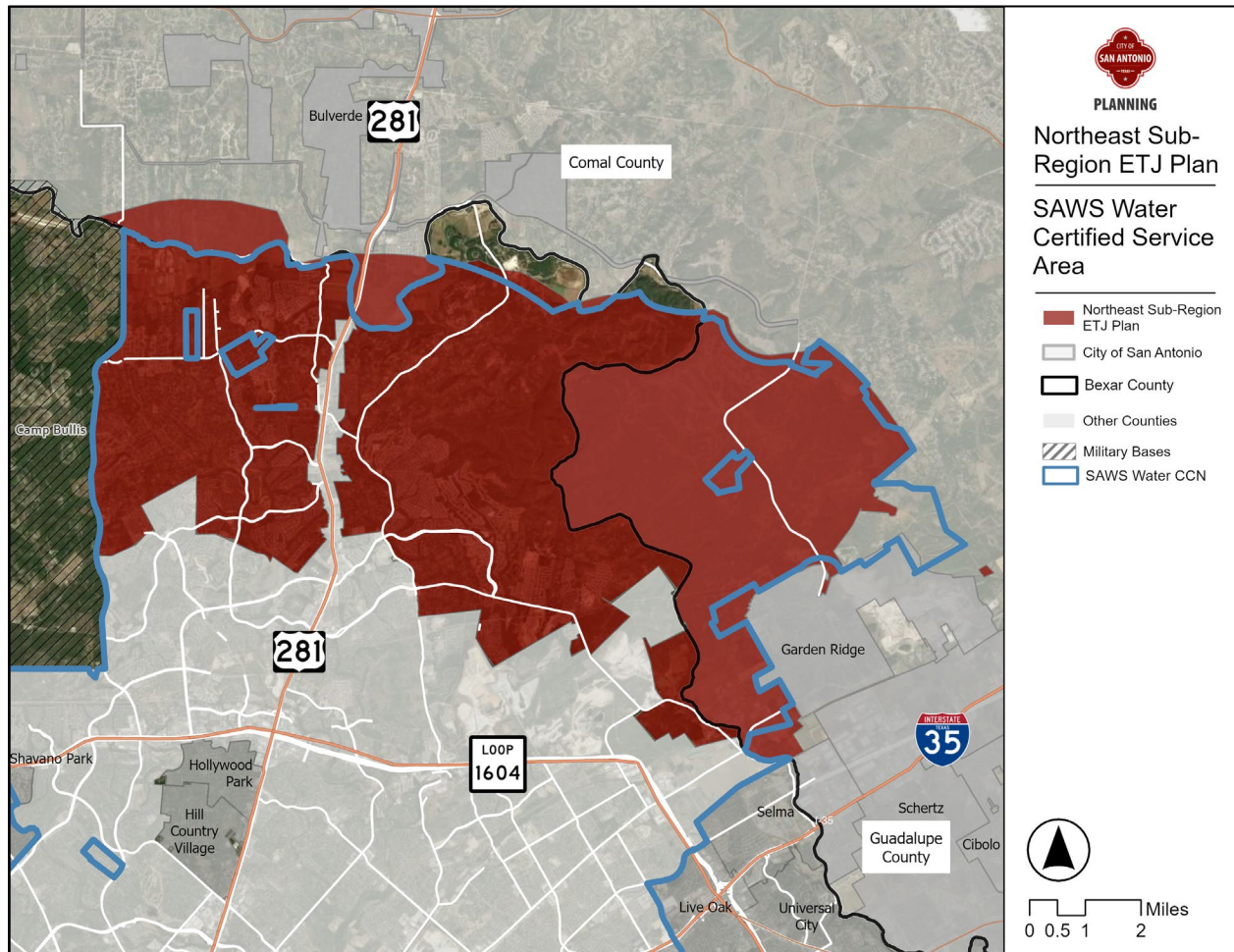
A significant share of the Northeast Sub-Region receives emergency services from Bexar County Emergency Services District (ESD) #3. ESDs provide critical emergency response services, including fire protection and emergency medical services, in unincorporated areas of Bexar County. Understanding ESD boundaries is important for coordinating future growth, infrastructure investments, and public service delivery as development occurs within the ETJ Plan area. Coordination with affected ESDs should be considered during the implementation of transportation, utility, and land use recommendations.

Figure 13: SAWS Sewer Certified Service Area



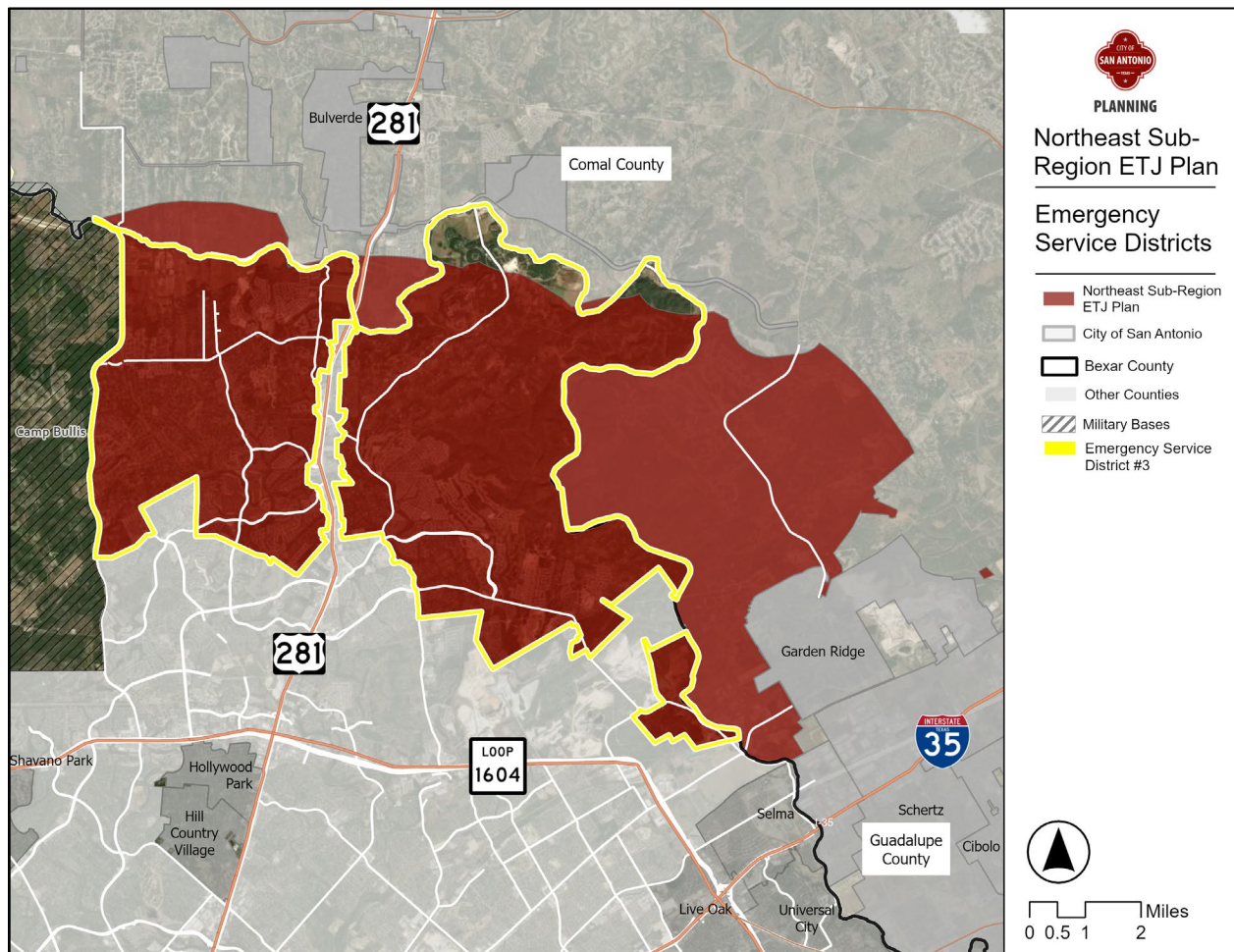
Source: San Antonio Water System (SAWS); TXP, Inc.

Figure 14: SAWS Water Certified Service Area



Source: San Antonio Water System (SAWS); TXP, Inc.

Figure 15: Emergency Service Districts



Source: Bexar County; TXP, Inc.

Section 3 – Stakeholder Input

As part of the planning process, two primary stakeholder groups were identified to provide input and guidance.

The first group consisted of community stakeholders including developers, landowners, attorneys, and representatives from real estate organizations. This group provided input on market conditions, development feasibility, regulatory considerations, and long-term growth expectations within the Extraterritorial Jurisdiction (ETJ).

The second group was a technical stakeholder group comprised of City departments and key partner public sector organizations with responsibilities related to infrastructure, transportation, utilities, environmental resources, and regional coordination. Technical stakeholders included representatives from:

- City of San Antonio Development Services Department (DSD)
- City of San Antonio Economic Development Department (EDD)
- Joint Base San Antonio (JBSA)
- Alamo Area Council of Governments (AACOG)
- Alamo Area Metropolitan Planning Organization (AAMPO)
- Bexar County
- Comal County
- CPS Energy
- Green Spaces Alliance
- Great Springs Project
- San Antonio Water System (SAWS)
- VIA Metropolitan Transit (VIA)
- Edwards Aquifer Authority (EAA)
- San Antonio River Authority (SARA)

Additionally, two community meetings were held to engage residents and stakeholders who live and work within the Northeast Sub-Region ETJ Plan area. The meetings took place in November 2025 at the Encino Branch Library and in February 2026 at the Parman Branch Library.

Stakeholders consistently described the Northeast Sub-Region as an area facing significant growth pressures constrained by infrastructure capacity, environmental regulations, land availability, and jurisdictional complexity. While the area remains attractive for low-density residential development and a rural lifestyle, long-term development patterns will be shaped by the high cost of and difficulty in extending utilities, as well as regulatory limitations associated with the Edwards Aquifer, and military and conservation constraints.

Market Conditions and Development Feasibility

Stakeholders noted that the Northeast Sub-Region has experienced substantial growth in recent years with the most easily developed land already largely absorbed. Remaining development opportunities are seen as increasingly expensive and complex due to limited infrastructure, environmental regulations, and the scarcity of large, contiguous parcels. The preference for large-lot, low-density residential development is expected to continue, reflecting both market demand and regulatory constraints.

Commercial development is viewed as particularly challenging outside the US Highway 281 North corridor. Environmental regulations, high infrastructure costs, and limited water and sewer availability were cited as restricting commercial feasibility in much of the area. As a result, most commercial activity is expected to remain concentrated along major corridors such as US Highway 281 North and within established employment centers like the Stone Oak Area Regional Center, with limited neighborhood-scale commercial uses serving surrounding residential development.

US Highway 281 North competes with other growth corridors outside of the Northeast Sub-Region, such as IH-10 West and State Highway 46. Some stakeholders believe these corridors offer fewer regulatory hurdles and stronger infrastructure capacity. Despite this, the Northeast Sub-Region remains attractive to buyers seeking larger lots and a more rural character, albeit at higher development costs.

Infrastructure, Utilities, and Transportation Constraints

Infrastructure limitations were consistently identified as the primary constraint on future growth in the Northeast Sub-Region. Stakeholders described ongoing challenges related to the availability of water and sewer service, roadway connectivity, and stormwater management. Obtaining water and sewer services can be difficult and time-consuming, often delaying or preventing development.

In areas lacking centralized sewer service, developers may choose to provide onsite wastewater treatment systems; however, these facilities may face community opposition especially if there are environmental concerns. Regulatory interpretations by state and local agencies can further affect allowable densities and treatment requirements, increasing uncertainty for developers.

Transportation infrastructure is similarly constrained. The major thoroughfares within the Northeast Sub-Region are US Highway 281 North, Blanco Road, Canyon Golf Road, Smithson Valley Road, TPC Parkway, and Evans Road. The public sector has limited authority to create new roadway corridors outside existing alignments, resulting in connectivity gaps that reduce development viability. Limited east–west connections and insufficient roadway capacity were cited as barriers to coordinated growth.

Stakeholders also emphasized long-term maintenance and funding challenges. In unincorporated areas within the ETJ, developers typically fund initial infrastructure improvements. The mechanisms for long-term maintenance, expansion, and system integration remain unclear, creating fiscal and operational concerns.

Military, Environmental, and Conservation Zones

As noted by stakeholders, environmental constraints and the presence of military facilities play a significant role in shaping development patterns across the Northeast Sub-Region. The Edwards Aquifer Recharge and Contributing Zones were consistently identified as sensitive areas requiring careful management to avoid overdevelopment and inappropriate density. Stormwater management remains a particular challenge in older subdivisions that predate current detention and flood mitigation standards. Large conservation easements, including those near Cibolo Canyons, help preserve natural resources and open space while also influencing where and how development occurs. However, residents often have difficulty identifying the extent of protected areas and understanding how these designations affect adjacent private property.

San Antonio has collaborated with its military partners through a Joint Land Use Program/Regional Compatible Use Plan (RCUP), formerly known as a Joint Land Use Study (JLUS). This effort promotes coordinated planning and development practices among the City, military installations, and other regional partners such as surrounding counties and communities. This program provides a framework for collaboration that supports mission readiness and military operations by reducing land use conflicts and ensuring future development is compatible with long-term defense objectives, while balancing regional growth and community priorities.

To support and protect military operations and training activities at Joint Base San Antonio (JBSA)-Camp Bullis, the City established additional development standards and criteria through lighting and sound-related overlay zoning districts. While some portions of the Northeast Sub-Region are not directly subject to the City's military overlay zoning districts, these overlays nonetheless limit development intensity while shaping design standards in affected areas.

Land Use Planning, Annexation, and Financing Tools

Stakeholders emphasized the importance of aligning future land use planning with realistic market conditions and infrastructure capacity. The North Sector Plan was adopted by the City in 2010 but is now widely viewed as outdated because it does not reflect current development patterns, new land use categories that were adopted in 2017, and known constraints related to military operations and environmental protection regulations.

While annexation was discussed as a potential tool for accessing infrastructure, service agreements, or special purpose districts, most developers prefer to remain in the ETJ unless annexation provides a clear and immediate benefit. In many cases, high infrastructure costs

cannot be fully offset through developer contributions alone due to proportionality limits. As a result, special districts are increasingly used to fund infrastructure in the ETJ. While these tools can enable development, stakeholders noted that residents often do not fully understand special assessments or long-term financial obligations. In some cases, annexation may be necessary to offset infrastructure costs through city tax revenues, though this approach involves fiscal, political, and service-level trade-offs.

Economic Development, Transit, and Other Public Services

Economic development activity is currently concentrated along the US Highway 281 North corridor and within the Stone Oak Area Regional Center. Within the City, incentive tools such as Chapter 312 tax abatements and Chapter 380 agreements are available for qualifying projects.

Transit service near the Northeast Sub-Region includes the VIA Link Naco Pass Zone (a geographically limited, on-demand, ride share program) and the Stone Oak Park & Ride that provides express service to Downtown and the San Antonio International Airport. While airport service is available, demand has been lower than anticipated, and transit usage remains limited in lower-density areas.

Public service expectations vary across the sub-region. Newer residents often desire urban-style amenities such as parks, schools, and transit, while long-term residents prioritize maintaining rural character. Public safety and basic services were identified as common priorities across stakeholder groups.

Community Awareness and Communication

Stakeholders consistently identified a need for improved public education and communication. Many residents are unaware of whether they live within San Antonio city limits or the ETJ, which can result in a lack of understanding surrounding taxes assessed, available services, land use authority, and development regulations. Additionally, this can lead to surprises, confusion, and public opposition when new development occurs.

Education about special taxing districts, regulatory responsibilities, and infrastructure provision was seen as essential toward reducing misinformation and building public trust. Clear, accessible planning documents and proactive outreach efforts were recommended to improve understanding among residents and developers of government structure and policy.

Strategic Opportunities

Despite significant constraints, stakeholders identified strategic opportunities for the Northeast Sub-Region. Participants emphasized the importance of balancing conservation efforts with carefully planned development, noting that limited neighborhood-scale commercial uses could be compatible with environmental protection, if thoughtfully designed.

Section 4 – Future Land Use Map

The Future Land Use Map is an important component of the Northeast Sub-Region Extraterritorial Jurisdiction (ETJ) Plan. It translates existing conditions analysis and stakeholder input presented in the preceding sections, as well as the recommendations detailed in the following section into a spatial framework for guiding future growth and development within the sub-region. In this way, the Future Land Use Map is intended to reflect both the opportunities and constraints identified throughout the planning process, including market conditions, infrastructure and utility capacity, environmental resources, military compatibility considerations, and the City's evolving approach to annexation and growth management. While the Future Land Use Map does not inform zoning in the ETJ, it provides an important policy guide for coordinating land use expectations, infrastructure planning, and future City actions in the Northeast Sub-Region.

Figure 166: Northeast Sub-Region Future Land Use Map

<insert map>

This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries.



PLANNING

Northeast Sub-Region Future Land Use Map

Legend

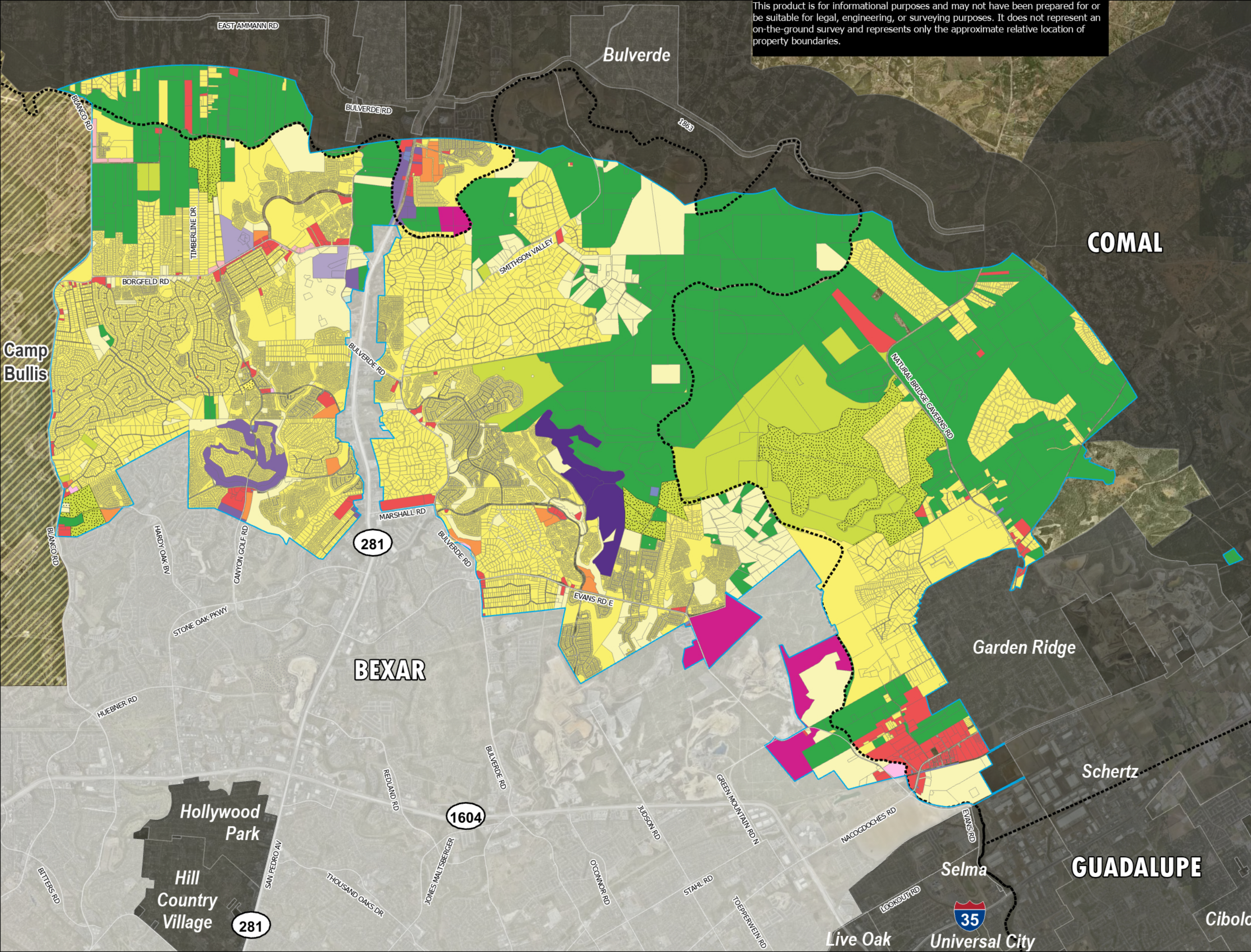
- Northeast ETJ Plan Boundary
- City of San Antonio
- Other Cities
- Other Cities ETJ
- County Boundaries
- Military Bases
- EAPP Conservation

Future Land Use Category

- Residential Estate
- Low Density Residential
- Urban Low Density Residential
- Medium Density Residential
- High Density Residential
- Neighborhood Commercial
- Community Commercial
- Regional Commercial
- Neighborhood Mixed-Use
- Urban Mixed-Use
- Regional Mixed-Use
- Employment/Flex Mixed-Use
- Business/Innovation Mixed-Use
- Light Industrial
- Heavy Industrial
- City/State/Federal Government
- Agricultural
- Parks/Open Space



0 0.5 1 2 Miles



Comprehensive Land Use Categories

The Northeast Sub-Region utilizes a range of land use designations that represent, encourage, and support the development patterns unique to the area. The following are summarized descriptions of the 18 comprehensive land use categories defined in the City of San Antonio Unified Development Code (UDC) at the time this plan was written. For a full and up-to-date list of categories and complete definitions, refer to “Comprehensive land use category” in Section 35-A101 Definition and Rules of Interpretation of the UDC, or contact the City of San Antonio Development Services Department.

Table 12: Comprehensive Land Use Categories and Descriptions

Category	Description
Residential Estate	Large-lot single-family detached houses on estate-sized lots or in conservation subdivisions; may include schools, places of worship, and parks.
Low Density Residential	Single-family detached houses, including manufactured and modular homes; may include schools, places of worship, and parks.
Urban Low Density Residential	Single-family attached and detached houses, small-lot residences, duplexes, triplexes, fourplexes, cottage homes, manufactured homes, low-rise apartments, and limited neighborhood-serving retail and service uses.
Medium Density Residential	Attached and detached homes, duplexes, triplexes, fourplexes, cottage homes, very small-lot homes, and low-rise garden-style apartments; higher-density multifamily should be near transit where practical.
High Density Residential	Low-rise to mid-rise multifamily buildings with four or more units, including apartments, condominiums, and assisted living facilities; may serve as a transition between lower-density residential and nonresidential uses.
Neighborhood Commercial	Small-scale retail, office, professional service, and convenience uses intended to support nearby residential areas and be located within walking distance of neighborhoods.
Community Commercial	Offices, professional services, retail, restaurants, cafes, markets, medical clinics, and similar uses that support multiple neighborhoods and have a broader market draw than neighborhood commercial.
Regional Commercial	High-intensity commercial uses that draw customers from adjacent communities and the larger metropolitan region, typically near expressways or major arterials.

Neighborhood Mixed-Use	Neighborhood-scale mix of residential, commercial, and institutional uses; residential above first-floor commercial uses are encouraged.
Urban Mixed-Use	Medium-intensity mix of residential, commercial, and institutional uses, typically larger than Neighborhood Mixed-Use but smaller than Regional Mixed-Use.
Regional Mixed-Use	High-density residential, commercial, and institutional uses, typically within regional centers and near transit, where mid-rise to high-rise buildings are appropriate.
Employment/Flex Mixed-Use	Flexible live/work environments with residential, office, retail, creative workspace, light service industrial, cottage industrial, and adaptive reuse opportunities.
Business/Innovation Mixed-Use	Industrial uses integrated with office, commercial, and residential uses, including industrial arts, high-tech fabrication, processing, assembly, vocational training, medical campuses, and research/development institutions.
Light Industrial	Manufacturing, business park, warehousing, limited retail/service uses, and other industrial-supportive activities with screening and buffering from non-industrial uses.
Heavy Industrial	Heavy manufacturing, processing, and fabricating businesses concentrated near arterials, expressways, or rail lines and separated from residential, or neighborhood-scale uses.
City/State/Federal Government	Areas owned and operated by a federal, state, or city agency, including government offices, public service facilities, military bases, state colleges, and federal courts.
Agricultural	Crop agriculture, ranching, related agribusiness practices, very low-density residential uses, limited agricultural-serving commercial uses, and rural character preservation.
Parks/Open Space	Large, linear, unimproved, public, or private open space areas where conservation, recreation, floodplain protection, utility corridors, and passive or active recreation are emphasized.

Section 5 – Recommendations & Findings

The Northeast Sub-Region Extraterritorial Jurisdiction (ETJ) Plan reflects evolving development conditions in the region and a changing policy environment at both the local and state levels. Recent changes in Texas state law have significantly altered San Antonio's tools and discretion related to the ETJ, annexation, and growth management. This requires a recalibration of how the City guides development beyond its current municipal boundaries. As a result, the City's role has shifted from one centered on unilateral regulatory authority to one that should increasingly emphasize coordination, incentives, and alignment with market conditions and service capacity. This Northeast Sub-Region ETJ Plan provides a policy framework to guide growth under these constraints, ensuring that future development patterns support long-term City objectives while responding to statutory limitations and regional dynamics.

1. The Future Land Use Map for this area has been updated utilizing the comprehensive land use categories used in the SA Tomorrow Sub-Area Plans and reflecting current development patterns across the Northeast Sub-Region. Market conditions are expected to remain the primary driver of development, timing, and pace.
2. A transparent, consistent, and unambiguous regulatory environment is essential to reducing uncertainty for residents and developers alike. Aligning the Northeast Sub-Region ETJ Plan with the City's Annexation and Growth Management Policy, a component of the SA Tomorrow Comprehensive Plan, will promote predictable development outcomes and provide a clear framework for future annexation and growth management decisions.
3. An ETJ incentive policy that encourages voluntary annexation while supporting development patterns aligned with the City's long-term goals can strengthen the City's ability to guide growth in this area. As annexation now requires mutual agreement, targeted incentives can serve as an important tool to influence both location decisions and development outcomes within the Northeast Sub-Region. Key elements of this approach could include:
 - Targeted regulatory and policy incentives for industrial, commercial, and mixed-use projects that elect to remain within the City's ETJ and align with City development objectives. When coordinated with capital improvement planning, these incentives could help prioritize infrastructure investments that support strategically significant projects.
 - Tract-level annexation prioritization based on objective criteria such as tract size, proximity to existing or planned transportation and utility infrastructure, and known constraints (including military compatibility and environmental conditions). This prioritization framework could guide where incentive tools are made available and

help align landowner and developer interests with City annexation and growth management goals.

4. Coordinated public sector infrastructure and utility investment can play a critical role in guiding growth and development in the Northeast Sub-Region. While there is a level of coordination that currently exists, enhanced financial and institutional support for coordinated planning would help accelerate desirable development patterns, improve service efficiency, and reduce redundancies. The following actions which could advance this objective:
 - Establish a formal coordination framework for utility, transportation, and other infrastructure planning among public providers. This framework could include a designated point of contact empowered to serve as an infrastructure and utility ombudsman for landowners, developers, and other stakeholders.
 - Periodically review and adjust utility service area boundaries to reflect evolving conditions. Considering existing state law and ETJ release petitions, prioritize infrastructure access in key geographic areas that align with long term development goals and policy objectives.
5. Recent changes to Emergency Services District (ESD) rules under state law create new considerations for annexation in the Northeast Sub-Region, even in cases where property owner consent is obtained. Under the revised framework, an ESD's board of directors must evaluate the emergency services provided in the area proposed to be annexed to ensure continuity and adequacy of service if the City intends to remove the territory from the district. If the board determines that City emergency services would not meet or exceed the level of service provided by the ESD, it may not agree to removal of the territory proposed to be annexed within the ESD's boundaries. If the City believes that its services meet or exceed the ESD's level of service, the City may challenge the board's decision and force the issue to be resolved through binding arbitration.
 - City-provided emergency services must meet or exceed the existing ESD level of service for the area proposed to be released. "Level of service" for fire and emergency medical protection means the location, deployment, and response time of fire suppression or medical resources originally dispatched to a structural or wildland fire or emergency medical incident.
 - ESD service impacts should be evaluated early in the annexation process to identify potential service gaps, cost implications, and/or operational challenges that could affect annexation feasibility or timing.

These requirements underscore the importance of aligning annexation strategy with emergency service capacity planning and intergovernmental coordination.

DRAFT