# Clean Ports Report Card Port of Houston



Prepared by Environmental Community Advocates of Galena Park October 2, 2025

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## THE PORT OF HOUSTON IS A Wharf in Progress.

WHARF IN PROGRESS

When it comes to cleaning up its air pollution emissions and meaningfully collaborating with the community, the Port of Houston ("the Port") is a Wharf in Progress. The Port has taken steps to modernize and decarbonize its operations by conducting emissions inventories, developing a Clean Air Strategy Plan, and securing millions in federal funding to support low- and zero-emission projects. For example, the Port has deployed hybrid-electric rubber-tired gantry cranes and secured funding for 30 new zero-emission trucks and zero-emission truck infrastructure. However, most of these efforts are in the early stages and are not supported by an implementation plan with clear commitments and timelines.

The residents living along the Houston Ship Channel experience high rates of asthma and other pollution-related health conditions. While the Port has some policies in place to engage with the public, meaningful collaboration and accountability remain limited. Port decision-makers have yet to embrace the kind of shared leadership and environmental justice framework that neighboring communities are calling for.

By centering the voices of portside communities, investing in zero-emission infrastructure, and strengthening its public engagement practices, the Port can chart a new course that delivers economic prosperity without sacrificing the health and safety of the Port's workers and neighboring communities.

Table 1. Port of Houston Clean Ports Report Card Results

Category	Score	Grade
<b>Emissions Inventory</b>	7.67 / 9 Points = 85%	Approaching Excellence
Clean Air Planning	4.67 / 8 Points = 58%	Just Starting
<b>Emissions Reductions Actions</b>	8.2 / 18 Points = 45%	Long Way to Go
Community Engagement and Collaboration	6 / 12 Points = 50%	Just Starting
TOTAL	26.5 / 47 Points = 56%	Wharf in Progress

#### Introduction

#### A. History of the Port of Houston and Port Advocacy

The Houston Ship Channel has long been a vital artery of commerce and industry in Southeast Texas. Its origins date back to the mid-19th century, when Houston's founders envisioned connecting the inland city to the Gulf of Mexico. This vision materialized with the help of local business leaders and public investment, culminating in the official opening of the deepwater Houston Ship Channel on November 10, 1914. President Woodrow Wilson remotely activated a cannon to commemorate the event, symbolizing the city's emergence as a major port.

Over the next century, the channel evolved into one of the busiest ports in the United States, supporting the regional economy and serving as the primary hub for the petrochemical industry. Stretching over 50 miles, the channel has required constant dredging and maintenance to accommodate increasingly large vessels and growing cargo volumes.

The port's expansion has led to significant environmental and community concerns, particularly around the dredging process. The community is concerned about the toxic chemicals in the dredge spoils and the effects on nearby residents. The testing of the dredge materials demonstrated elevated concentrations of 10 chemical contaminants, including dioxins and PCBs, some as much as 25 times greater than EPA guidelines. Many residents, including children, live within the shadows of dredge material dump sites.

#### **Project 11: Houston Ship Channel Expansion**

The most recent and ambitious port expansion, known as Project 11, was launched in 2021 by the U.S. Army Corps of Engineers (USACE) in partnership with the Port of Houston Authority. USACE and Port Houston are deepening the Houston Ship Channel near Pleasantville, Port Houston, and Galena Park so that larger tanker vessels can use the channel. The expansion is expected to bring significant economic benefits to the petrochemical industry at the cost of the health and safety of neighboring communities.

The dredging activities for Project 11 have resulted in millions of tons of contaminated spoils being dumped in residential areas, such as Galena Park, Port Houston, and Pleasantville, the equivalent of hundreds of thousands of dump trucks. These areas, already prone to flooding, have seen dredge spoils placed near community open spaces with minimal warning or signage.

Local communities <u>remain concerned</u> about its long-term environmental and health impacts. Soil tests have found elevated levels of PCBs, benzo(a)pyrene, dioxins, and furans in the dredged sediments, which can cause serious health impacts, including cancer, reproductive harm, and developmental harm. The chemicals are exposed during floods, which have been exacerbated by more frequent and intense hurricanes in recent years.

Many of the disproportionately impacted flood-prone areas are low-income, Black, and brown communities. Local organizations, such as the Healthy Port Communities Coalition, Environmental Community Advocates of Galena Park, and environmental justice advocates, have voiced opposition to the plans to deposit dredge near Houston communities. They call for:

- Depositing the dredge offshore in locations that support flood control or other benefits
- Marking existing dredge deposits with signage to adequately warn communities of the health impacts of exposure
- Regular testing of dredge spoils, in line with EPA and USACE guidelines, to capture the full scope of potential toxic substances in the dredged material
- Sharing this data with local communities
- Independent testing of the dredge sediment samples, to which the USACE has refused access

#### **Air Pollution**

In the American Lung Association's 2025 State of the Air Report's "Most Polluted Cities" list, the Houston metropolitan area ranked 7th-worst for ozone pollution and 8th-worst for annual particle pollution out of 228 metropolitan areas throughout the nation.

About half of the point sources for air pollution in the Greater Houston area are concentrated on the eastern side of Houston, where over twenty of the largest industrial air pollution sources in the region are located. The Port of Houston and the Ship Channel that feeds it run through the center of this area, generating a range of hazardous pollutants that compound those from the nearby industrial sources.

Advocates have raised the need for cleaner port equipment, eliminating air pollution not addressed by cleaner technologies, and improved air quality monitoring, particularly as the Port of Houston expands cargo capacity through Project 11.

#### **Looking Ahead**

The Houston Ship Channel continues to represent both a symbol of economic strength and a site of environmental justice struggle. As Project 11 progresses, it becomes a test case for how infrastructure megaprojects can—and must—balance economic growth with environmental protection and community well-being.

True progress will require a deeper commitment to equity, sustainability, and shared decision-making for the communities that have long borne the cost of Houston's industrial prosperity.

#### **B. About the Grading Team**

**ECAGP** (Environmental Community Advocates of Galena Park) would like to acknowledge that the grading team responsible for helping to create the Port of Houston report card is a diverse group of environmental experts, community advocates, public health professionals, and data analysts. The collaborative team was formed from the following organizations and individuals: Friends of the Earth, Healthy Ports Community Coalition (HPCC), and the Better World group, to evaluate a range of indicators — including air and water quality, public health impacts, community engagement, and environmental justice — to provide a comprehensive and transparent assessment of the port's performance. Drawing from both scientific data and community feedback, the team ensures the report card reflects real conditions experienced by residents and frontline neighborhoods. This report will help to support accountability, inform policy decisions, and empower communities with accessible, fact-based insights into the environmental and social impact of port operations for now and the future.









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**Category Description**: This category scores how the port measures emissions, the frequency of this reporting, and whether this reporting is made available to the public. An emissions inventory is a quantification of selected pollutants that are emitted within a designated area by mobile sources over a given time period. Emissions inventories help port operators identify and quantify the air emissions impacts across the port's operations.

The Greater Port of Houston is made up of nearly 200 private and public industrial terminals. The Port of Houston, known as Port Houston, is the owner of the public terminals and is the local sponsor of the Houston Ship Channel.

Port Houston conducted an emissions inventory for 2013 and most recently, 2019. During this time, Port Houston's emissions inventory states that while cargo throughput increased significantly, overall emissions of all pollutants were lower in 2019 for public terminals due to fleet turnover and the use of lower sulfur content fuel by ocean-going vessels (OGVs). However, emissions from OGVs and harbor vessels from private terminals increased in 2019, and it is unclear what the emissions profile of other sectors is at private terminals because they are not included in the Port's emissions inventory.

The geographic scope of <u>Port Houston's 2019 emissions inventory</u> measures drayage truck and OGV emissions generated while at the Port and generated in transit, as well as the emissions from the Port's container terminals and broader port operations (Scopes 1 and 2).

While comprehensive inventories are important, we recognize that they can be expensive and time-consuming to publish. A lower-cost activity that can be taken in between inventories is to monitor the age of the drayage truck fleet, cargo handling equipment, and vessels. Tracking these metrics and setting goals for transitioning to cleaner trucks, cargo handling equipment, and vessels is less costly, can be updated regularly, and is easy to communicate.

Table 2. Emissions Inventory Scores

Metric	Points	Score Explanation
Emissions Inventory (EI)	2/2	Port Houston published an <u>emissions inventory</u> of their 2019 emissions in 2021.

Inventory Is Published On Port's Website	1/1	Yes, the Port's emission inventory is published on their website <u>here</u> .
Frequent Inventory Updates	0/1	To get a point for this metric, the Port should follow the best practice of updating its emissions inventory every 2-4 years. Port Houston did not receive a point because its current inventory is based on 2019 emissions and is six years out of date.
Inventoried Pollutants	0.67 / 1	The Port's inventory includes the following pollutants: NOx, PM10, PM2.5, VOC, CO, SOx, and CO2e. <b>The Port's next inventory should also include N2O and Black Carbon</b> .
Inventoried Sectors	1/1	The Port included all major sectors in its 2021 inventory - ocean-going vessels, harbor vessels, cargo handling equipment, rail, and heavy-duty vehicles.
For ports with multiple terminals, do they include all terminals in the inventory?	1/1	The Port included all terminals in their inventory - those that they own as well as private terminals. However, they calculated a separate inventory for private terminals, which only included OGV and harbor craft. The inventory does not include cargo handling equipment, rail, or drayage emissions on private terminals.
Extent To Which EI Methodology Aligns With <u>EPA's EI</u> <u>Guidelines</u>	2/2	Port Houston's emissions inventory generally follows the EPA's <u>guidelines</u> .
Total for Category 1: Emissions Inventory	7.67 / 9 = 85%	Approaching Excellence





**Category Description**: This category evaluates the port's targets and milestones for overall emissions reduction and decarbonization of key infrastructure.

Port Houston's most recent <u>Clean Air Strategy Plan (CASP)</u> was released alongside its emissions inventory in 2021. This is the primary document that this report refers to as a Clean Air Plan to grade the Port in this category. The CASP sets a goal to reduce emissions of pollutants measured in the Port's emissions inventory, with "stretch targets" of reducing NOx emissions to 25% below the 2007 baseline, and PM2.5 emissions to 75% below the 2007 baseline. The Port also has a goal to reach carbon neutrality by 2050, but only for its scope 1 and 2 emissions.

There are several other clean air planning-related documents that we refer to in this category and throughout the report card, these include:

- The Environment, Social, Safety, and Governance (ES2G) Reports
  - The Port released its <u>first ES2G Report in 2021</u> and released subsequent updated ES2G reports in 2022, 2023, and 2024.
- The Sustainability Action Plan was also released in 2021.

We encourage the Port to improve upon its CASP in its next iteration by:

- 1. Setting a more ambitious and time-bound overall emissions reduction target.
- 2. Setting more ambitious, time-bound, and specific emissions reduction targets for each sector and creating actionable plans for reaching those targets.

Table 3. Clean Air Planning Scores

Metric	Points	Score Explanation
Clean Air Planning	2/2	Port Houston published a <u>Clean Air Strategy Plan (CASP)</u> in 2021. However, it is outdated, does not include enforceable targets, and does not commit any resources towards achieving the goals outlined in the plan.

Emissions Reduction Target	0.67 / 1	The CASP includes time-bound emission reduction targets, but they could be more ambitious. The CASP sets a goal to reduce NOx emissions to 25% below the 2007 baseline, and PM2.5 emissions to 75% below the 2007 baseline. This goal appears to apply to Scopes 1, 2, and 3. The CASP's 2050 carbon-neutral goal for emissions, however, only applies to Scope 1 and 2.
Drayage Truck Electrification Target: % By Date	0/1	The CASP does not set a specific drayage truck electrification target. The Port should adopt a truck electrification goal for both public and private terminals. The CASP includes a strategy to upgrade equipment and technology to reduce emissions, which calls for "Tactic 1 — Promote Heavy Duty Truck population to newest emissions standards and support new fuels and technology adoption for lower emissions drayage trucks." The stated goal is that by 2027, half of the drayage truck visits to the Port will be MY 2010 and newer.
Ocean-Going Vessels Target: Target for Shore Power	0.5 / 1	While the CASP does not set a specific shore power target, the Port received a half-point because the Port did engineering plans for shore power at their Bayport Container Terminal and included shore power in their original Clean Ports Program grant (not selected for funding). Furthermore, Port Houston's 2022 ES2G report states that, between 2022-2025, they will "pilot shore power" and by 2040 achieve "shore power maximized."
Rail Target	0.5 / 1	Houston doesn't have a specific target. The CASP includes "Tactic 3 — Encourage PTRA and Class 1 Railroads to replace and upgrade locomotives." The Port's ES2G report mentions only that by 2050, "State of the art is zero-emission and/or carbon neutral technology and supplies for trucks, harbor vessels, ships, rail." The Port's ES2G plan identifies rail emission reduction opportunities but does not commit resources or set a target or interim goals.

Harbor Craft Target	0.5 / 1	<ul> <li>Port Houston does not have a strong or clear plan for electrifying harbor craft. However, the scoring team assigned the Port a half-point for the following reasons:</li> <li>1. The CASP includes the following HC tactic: "Tactic 4 – Support Harbor Vessel Tug and Tow operators to continue upgrading fleets"</li> <li>2. The Port applied for and won a DERA grant in 2022 to support transitioning a tug boat to a newer/less-emitting engine.</li> <li>3. In the ES2G plan for 2022-2025, they state a goal to "Capture leading practices in ocean and harbor vessels", and by 2040, they mention a goal to see "Zero-emission vessels" deployed, with specificity of which types and whose, but presumably HC could be included in this category.</li> <li>4. The Texas Emission Reduction Program has a history of funding engine upgrades for tug boats operating in the Houston area.</li> </ul>
Cargo Handling Equipment Target	0.5 / 2	The CASP includes the following CHE tactic: "Replace Port Houston Owned Tier 0 and Tier 1 Cargo Handling Equipment with Tier 4." The ES2G plan includes plans to "Pilot zero-emission forklifts and other CHE" between 2022 and 25; "Pilot zero-emission forklifts and other CHE" by 2030; and "CHE fleet turnover to zero-emission is complete" by 2040. It is important to note that in both plans, they are referring to the PHA-owned CHE, not the broader CHE used by the terminal operators at the terminals they lease.
Total for Category 2: Clean Air Planning	4.67 / 8 Points = 58%	Just Starting





**Category Description**: This category evaluates the port's emission reduction actions, such as emissions reduction programs or adoption of low or zero-emission technology for drayage trucks, ocean-going vessels, rail, harbor craft, and cargo handling equipment.

The Port of Houston has made some progress on actions that reduce emissions, but it still has a long way to go. Despite having very minimal electrified operations for most emission sources, points were awarded where the Port has taken some action towards electrification by applying for funding and starting projects to achieve emissions reductions. For example, the Port has deployed <a href="https://hybrid-electric rubber-tired qantry">hybrid-electric rubber-tired qantry</a> (RTG) cranes and yard hostlers. The Port has also received funding for 30 new zero-emission short-haul trucks and electric vehicle truck chargers.

The Port received some points for investing in cleaner harbor craft but could improve its score by investing in shore power for harbor craft and investing in fully zero-emission harbor craft rather than hybrid-electric vessels. The port could also improve its score in the rail category by taking actions to monitor and reduce idle emissions from locomotives and switchers.

The category where the Port scored the lowest (receiving zero points out of four) is in reducing emissions from ocean-going vessels. The Port has made no progress in installing shore power. Installing shore power for ocean-going vessels enables vessels to plug in to the electrical grid while at berth, instead of relying on polluting auxiliary engines, resulting in significant air quality and public health benefits. In 2024, an <a href="ICCT analysis">ICCT analysis</a> found that tanker vessels accounted for the highest portion of the at-berth air pollution emitted at the Port of Houston and suggested that the Port could begin to reduce emissions in this category by exploring shore power for tankers.

\* It is recognized that the Port does not have direct control over some areas of port infrastructure, such as railways and private terminals. However, we encourage the Port to collaborate with private terminal operators, third-party trucking operations, and railroad providers (Union Pacific and BNSF Railway). This Report Card doesn't prescribe specific electrification technologies. We uphold the principles that only green hydrogen fuel should be considered an emissions abatement, and it must be produced with surplus water and renewable electricity. Furthermore, green hydrogen should only be applied in hard-to-abate sectors where it reduces human health and emissions impacts to local environmental justice communities when compared to alternatives.

 Table 4a. Emissions Reduction Actions Scores: Drayage Trucks

Metric	Points	Score Explanation
Drayage Trucks		
Rate Progress Towards Truck Electrification Goal/ Interim Goal	0.67 / 2	While the Port has done little to electrify drayage trucks, we recognize that the Port has taken steps to reduce emissions from this sector. In 2024, the Port received a \$26.9 million USDOT grant to help local trucking companies purchase approximately 30 zero-emission drayage trucks. However, these are likely to be hydrogen-powered, not electric. They will likely be using gray hydrogen to power the trucks in their pilot project, and blue hydrogen at a later date.
Existence of Programs to Incentivize or Provide Subsidies to Facilitate the Adoption of ZE Trucks	1/1	As mentioned above, the new funding for the CLEANSTACS Program (Catalyzing Lower Emissions with Alliances and New Systems in Trucking and Community Sustainability) will help fund 30 new zero-emission short-haul trucks and portable electric chargers for battery electric vehicle trucks. A news article on the program states, "Fleet owners are responsible for covering 20% of the cost, and both electric and hydrogen fuel-cell trucks are eligible."  The federal funding is through the Reduction of Truck Emissions at Port Facilities program, which is funded by the Bipartisan Infrastructure Law.
Existence of Programs Like Truck Replacement or Idle Reduction Programs	0.5 / 0.5	While not a program operated by the Port, the Texas Commission on Environmental Quality's Seaport and Rail Yard Areas Emissions Reduction Program (SPRY) provides grants for upgrading or replacing older drayage and container handling equipment. The Port should continue to support truck operators in understanding and applying for SPRY grants. Page 25 of the Port's CASP offers several tactics to improve heavy-duty diesel vehicles' technological efficiencies, including "Idling Reduction," but it is unclear whether Port Houston has made progress in implementing an idle reduction program.

 Table 4b. Emissions Reduction Actions Scores: Ocean-Going Vessels

Metric	Points	Score Explanation
Ocean-Going Vessels		
Is the Port Making Adequate Progress Towards Meeting Their At Berth Pollution Reduction Goal (Installing Shore Power Capacity)	0/2	Studies on shore power development at the Port of Houston have been conducted, but the Port has not yet developed any plans or committed any resources to deploying shore power infrastructure. In the Port's 2022 ES2G Update, the Port sets a goal to pilot shore power between 2022-2025, but there is no evidence of progress on this front. In 2024, an ICCT analysis found that tanker vessels accounted for the highest portion of the at-berth air pollution emitted at the Port of Houston and suggested that the Port could begin to reduce emissions in this category by exploring shore power for tankers.
Percent of Vessels Visiting the Port That Plug Into Shore Power	0/1	Since the Port of Houston does not have shore power available, 0% of OGVs visiting the Port plug into shore power. OGVs should use shore power as much as possible to connect to the local electricity grid, allowing them to shut off auxiliary engines while docked and reduce local emissions by up to 98%.
Percent of the Port's Berths That Have a Shore Power Connection	0/1	Currently, 0% of the Port's berths have shore power connection. A study conducted by Ramboll found that "Port Houston has physical infrastructure available (concrete boxes and conduits) at Bayport to install electrical power systems but has not yet implemented shore power" (Page 11).

Table 4c. Emissions Reduction Actions Scores: Rail

Metric	Points	Score Explanation
Rail		
Has The Port Invested In Battery Electric Switcher Locomotives?	1/1	Watco, a short-line railroad company that operates at private terminals in the Port of Houston, received a \$2.4 million TERP grant to deploy two battery-electric switchers. The Port acknowledges in its CASP that since switcher locomotives are locally operated by the Port Terminal Railroad Association (PTRA), of which Port Houston is a part owner, they present an opportunity for emission reductions.
Has the Port Taken Action to Monitor and Reduce Idle Emissions from Locomotives and Switchers?	0/1	The <u>CASP</u> states on page 28 that the Port is interested in adopting idle reduction policies, but no details on implementation or whether any resources have been dedicated to anti-idling equipment for locomotives. The CASP identifies connecting to the grid or using Automatic Engine Stop Start (AESS) technology to reduce locomotive idling.
What Percent of Older Locomotives Has The Port Upgraded?	0/1	PTRA has a fleet of 24 MK1500D switcher locomotives that date to the 1950s and, according to the Port's emission inventory, have extremely polluting Tier 0 or Uncontrolled engines. It does not appear that PTRA has upgraded any of these switchers to less polluting engine Tiers.
Has the Port Taken Action to Minimize Locomotive Activity Near At-Risk Populations?	0/0.5	There is no evidence to suggest that the Port has taken actions to minimize locomotive activity near at-risk populations. According to the CASP, the Port's current switcher fleet runs on Tier 0 engines and accounts for 71 tons, or 12% of total locomotive NOx and 3 tons, 16% of total locomotive PM2.5 emissions. The Port can reduce the impact of these emissions on air quality in nearby communities by relocating maintenance and other locomotive operations within the rail facility to areas farther from potentially vulnerable populations. They may also adopt mitigation strategies such as improved air filtration systems or physical barriers to reduce adverse health effects from air pollution exposure.

Table 4d. Emissions Reduction Actions Scores: Harbor Craft

Metric	Points	Score Explanation
Harbor Craft		
To What Degree Is Shore Power Connection Available for Harbor Craft?	0/1	There is no record of shore power connection being available for harbor craft at the Port. As mentioned previously, the Port's 2022 ES2G Update sets a goal to pilot shore power between 2022-2025, but there is no evidence of progress on this front. A 2022 TCEO study did not find any shore power facilities for harbor craft in the Houston area.
Does the Port Have A Program to Accelerate Harbor Craft Engine Upgrades?	1/1	In 2021 the Port won a <u>DERA grant</u> for \$2.5M to "repower two marine vessels (4 engines) with new Tier 4 marine engines", in 2009 they won another DERA grant for \$600K to, "Replace/repower 25 marine engines" as well as another \$2.3M in 2009 to "Replace/repower 96 marine engines." In 2009-10, they also received \$1.5M to "Fuel switching to a low-sulfur fuel (less than or equal to 0.2%) for 21 ocean-going vessels that call on the Port of Houston". While the ad hoc process of applying for DERA grants cannot be considered a "program", it is a small progress.
Electrification of Harbor Craft	0.5 / 1	In 2023, Kirby Inland Marine introduced the nation's first plug-in hybrid-electric inland towing vessel to service barges throughout the Houston port region. In 2025, the Port ordered a hybrid-electric tour vessel to replace its aging tour boat. However, the Port did not receive a full point for this metric since both vessels are hybrid and not fully electric.

**Table 4e.** Emissions Reduction Actions Scores: Cargo Handling Equipment

Metric	Points	Score Explanation
Cargo Handling Equipm	ent	
Port Progress on Electrifying Cargo Handling Equipment	0.5 / 1	The Port has electrified some cargo handling equipment, but must go further. In 2024, the Port announced the arrival of six hybrid-electric rubber-tired gantry (RTG) cranes, and anticipated that 57 of their total 147 RTG cranes would be hybrid-electric by the end of 2024. It does not appear that this goal was met as the Port announced the purchase of 16 additional hybrid-electric RTG cranes in April 2025 and stated that the resulting total number of hybrid RTG cranes was 46. In the 2024 ES2G Report, the Port claims that ~40% of their RTG cranes were hybrid-electric and that their fully electric ship-to-shore cranes have been powered by 100% renewable electricity since 2020.
Existence of a Program to Optimize Loading/Unloading Time	1/1	The Port entered a five-year trial of the PortXchange port planning software after a 12-month trial period that started in 2020. The software provides scheduling transparency to all parties involved in maritime commerce to decrease port turnaround time.
Does the Port Have a Program to Update Cargo Handling Equipment to Be Cleaner?	1/1	In addition to the cargo handling equipment electrification efforts mentioned above, the Port claims in their 2024 ES2G Report to have partnered with an electric terminal truck manufacturer to pilot their all-electric terminal tractor, assess the equipment's performance, and evaluate its suitability for container operations. The Port owns one fully electric yard hostler, which they purchased as part of a pilot project.

Table 4f. Emissions Reduction Actions Scores: General

Metric	Points	Score Explanation
General		
Extent to Which the Port is Applying for Federal And State Funding to Achieve Zero Emissions and/or Emissions Reductions	1/1	According to the 2024 ES2G Report, in 2024, the Port successfully secured federal funding to "help introduce zero-emissions technology, improve air quality, support climate action and resiliency, strengthen relations with nearby communities, facilitate local workforce development, support agriculture exports, and improve stormwater drainage for local communities." This funding includes:  • Reduction of Truck Emissions at Port Facilities (RTEPF): \$25,105,985  • Clean Ports Program (CPP): \$2,981,399  • Port Infrastructure Development Program (PIDP): \$25,359,216
Total for Category 3: Emissions Reductions Actions	8.2 / 18 = 45 %	Long Way To Go





**Category Description**: This category evaluates the port's engagement with portside environmental justice communities, including the existence of community programs, workforce development, board representation, partnerships, and commitments to procedural justice.

The Port of Houston has made progress in improving its community engagement efforts over the last decade by building out its community engagement policies and its online portals for communicating information with the public.

The Port Commission first adopted a Community Engagement Plan in 2015, and in 2019, the Port Commission replaced the plan with a <u>Community and Stakeholder Engagement Policy</u>, which aimed to provide a "more comprehensive, organizational process to engage with stakeholders" (Page 3). This policy represents a step in the right direction and a willingness to improve the quality of the Port's community engagement.

While the Port of Houston engages in some community outreach, it ultimately scored a "Just Starting." We see the need for deeper partnership and collaboration with communities, beyond information sharing and gathering. We encourage the Port to consider major gaps, like setting measurable goals, in their community engagement with portside environmental justice communities. The Port has the potential to collaborate with communities by seeking and distributing community engagement funding for partnerships with portside environmental justice community CBOs, and developing a community advisory board or similar body, with environmental justice CBO representation. The Port should build community trust through these partnerships.

In our score explanations in this section, we recommend strategies and actions to increase community engagement and meaningful participation, including making public meetings more accessible to community residents, creating programs to measure and reduce air pollution exposure in environmental justice communities, and improving the Port's engagement with the Port Commission Community Advisory Council to ensure that they can meaningfully address community concerns.

**Table 5.** Community Engagement and Collaboration Scores

Metric	Points	Score Explanation
Community Engagement Program	1/2	The Port has community relations programs and initiatives. The Port also has a Community and Stakeholder Engagement Policy, which was published in July 2019. However, the Port needs to go deeper than informing and consulting the public about the Port's plans and operations, and implement a more intentional engagement framework that involves, collaborates with, and defers to community members to help port decision-makers understand and address the needs of portside environmental justice communities.
Quality/ Integrity Of Partnership With CBOs	1/2	The Port seeks community engagement funding for partnerships with CBOs; however, the Port falls short of successful and trust-building collaboration with portside communities. Since 2020, the Port Houston Community Grants Program has invested over \$2.1 million in local projects and organizations. However, these funds have not been used to mitigate the health and safety problems created by the Port.
Forum for Public Comments	0.5 / 1	There is a forum for community members to speak for three minutes at monthly Port Commission meetings. The Port also offers an online Community Feedback Form for community members to provide "comments, compliments, suggestions, or complaints". However, these forums are insufficient as there is no opportunity for dialogue between the community and the Port Commission.
Point of Contact for Community	1/1	The Port's <u>Community Relations page</u> says to connect with someone in the Community Relations Department, explore the Port's directory to find the right contact. The directory lists contacts for various staff in the community relations department, and a generic "community information line" email, <u>communityrelations@porthouston.com</u> . Including this email and a clear point person on the community relations page, could increase community accessibility to connect with the Port.

Community Advisory Board Or Other Similar Body	0.5 / 1	The Port Commission Community Advisory Council (PCCAC) is a 14-member council representing diverse communities and interest groups along the Ship Channel. However, the Port representatives do not have the authority to address community concerns, and there is limited authentic engagement as evidenced by the fact that the Port sets the agenda for these meetings, not the PCCAC members. The Port's Clean Ports Proposal, which received almost \$3 million in funding in 2024, included the creation of the PORT SHIFT Advisory Council and Community Engagement Forum. This forum could serve as a more representative advisory body, but the Port has yet to take action on standing it up.
Workforce Development Program	1/1	The Port of Houston has a workforce development program for residents, offering a range of education, training, mentorship, and job placement programs for the maritime and related industries. It is unclear how the program has benefited local residents. The Port could improve its workforce development program by expanding it to include training related to zero-emission technology.
Is the Port Working With/ Supporting Communities to Reduce Air Pollution Exposure?	0/1	The Port does not have a program to support the reduction of air pollution exposure in neighboring communities. The Port should have a program to collaborate with the portside communities to monitor and reduce air pollution exposure in the community. The program should provide in-home air monitors and air filters in neighboring communities and/or create green barriers to protect portside environmental justice communities from high-emissions areas.
Strong Process to Engage in Meetings	0.5 / 1	The Port Commission posts agendas before their meetings and allows community members to speak for three minutes. However, the meetings are during the daytime and do not provide access to translation or childcare. In the Port's Clean Ports Proposal, there is a commitment to provide childcare and transportation for residents participating in the PORT SHIFT Community Engagement Forum.

Existence of a Process to Give Community Time and Information to Understand Potential Commissioners Before Election or Appointment	0/1	The community is unaware of commissioner elections or appointments prior to them being made.
Extent to Which the Port's Governing Board Leadership Represents the Community and/or Has Relationships with the Community	0.5 / 1	Some individuals on the Port Commission are representative and responsive to portside communities, but not the majority. The HPCC has called for the Port to include the designation of a citizen representative on the Port Commission since 2013. In 2020, Brigette Murray, a native of Pleasantville, the Founder and Executive Director of Achieving Community Tasks Successfully (ACTS), and a member of the HPCC, was nominated to serve as a commissioner of the Port. Despite a major showing of community support, the City Council did not vote for Ms. Murray's appointment to the commission.
Total for Category 4: Community Engagement and Collaboration	6 / 12 = 50%	Just Starting

## APPENDIX A: ABOUT THE CLEAN PORTS REPORT CARD PROJECT

Ports are a major source of harmful air pollution at the local, national, and global level. Pollution from ports poses an especially significant threat to environmental justice communities due to historic and ongoing racist zoning practices that place ports adjacent to low-income communities and communities of color.

#### The Clean Ports Report Card Project

U.S. ports still have a long way to go despite decades of work by zero-emission advocates across the country to encourage ports to reduce their emissions and prioritize transparency and public engagement. The Port Report Card Project originated in 2025 as an accountability and advocacy tool to incentivize ports to reduce their climate and air pollution and engage port-adjacent communities most impacted by their operations.

#### The Clean Ports Report Card Template

This report card was created using a template developed by advocacy partners from cities across the United States with support from the consulting firm Better World Group. This report card was developed by advocacy partners for clean port advocates to use as a communications tool and to document resource gaps relevant to advocacy.

A "report card team" consisting of Environmental Health Council, Friends of the Earth, Pacific Environment, Sierra Club, Union of Concerned Scientists, Environmental Defense Fund, and Earthjustice provided guidance on initial scoring template development. Environmental Justice organizations across the U.S. were engaged to review and shape the final template, including Southward Environmental Alliance, Parents Engaging Parents, Rise St. James, Environmental Health Coalition, Environmental Community Advocates of Galena Park, Public Citizen, West Oakland Environmental Indicators Project, RiSE4EJ, Communities for a Healthy Bay, and Moving Forward Network.

For more information about the Clean Ports Report Card Project, and to develop your report card, visit <u>cleanportsreportcard.org</u>.

#### **APPENDIX B:**

#### **TEMPLATE SCORING RUBRIC**

#### A. Report Card Categories

The Report Card scoring methodology includes a grading scale for four metric categories, as well as a grading scale for all of the categories combined. Ports will be graded on each of the categories:

- **Category 1:** Emissions Inventory
- Category 2: Clean Air Planning
- Category 3: Emissions Reduction Actions, and
- Category 4: Community Engagement and Collaboration

#### **B. Grading Scale for Category Scores**

The tables below define the grading scale for each scoring category. Category scores are defined by grade ranges based on the minimum percent of the total applicable points received.

#### C. Grading Scale for Overall Score

The final table below defines the grading scale for the overall score. Overall scores are defined by grade ranges based on the minimum percent of the total cumulative points received in the four scoring categories.

#### **Category 1 Grading Scale and Definitions: Emissions Inventory**

Scores how the port measures emissions, the frequency of this reporting, and whether this reporting is made available to the public.

Score	Min % of Points Received	Definition
Long Way to Go	0%	The port does not have an emissions inventory, or it has a very limited inventory that does not cover a broad range of pollutants and/or sectors. The port mostly does not follow federal guidance on reporting.
Just Starting	50%	The port has an air quality inventory that measures some key pollutants and/or sectors, but not all. The port does not adequately follow federal guidance on reporting.
Making Progress	70%	The port has an air quality inventory that generally follows federal guidance for reporting, but it may not cover all pollutants or sectors, may not be updated frequently, or may not be available to the public.
Approaching Excellence	80%	The port has an air quality inventory that follows federal guidance for reporting, but it may not cover all pollutants or sectors, may not be updated frequently, or may not be available to the public.
Gold Standard	90%	The port has a complete emissions inventory, covering all relevant emissions sources and pollutants. This inventory is comprehensive, regularly updated, and available to the public.

#### Category 2 Grading Scale and Definitions: Clean Air Planning

Evaluates the port's targets and milestones for overall emissions reduction and decarbonization of key infrastructure.

Score	Min % of Points Received	Definition
Long Way to Go	0%	The port has no emission-reduction aims published or there is no indication of commitment to reducing emissions. Emission reduction is not on the port's agenda.
Just Starting	50%	The port has published emission-reduction aims but they are either very general, not measurable, or lack a clear time frame.
Making Progress	70%	The port has set emission-reduction aims, but they are either vague, not fully quantifiable, or lack a clear timeline. These goals are somewhat meaningful but could be more robust.
Approaching Excellence	80%	The port has set relatively strong emission-reduction goals, but some could be made stronger or more specific and time-bound.
Gold Standard	90%	The port has clearly published specific, forward-looking emission-reduction aims with quantifiable goals for significant pollutants. These goals are ambitious, science-based, and have a clear timeline for achievement.

#### **Category 3 Definitions: Emissions Reductions Actions**

Evaluates the port's emission reduction actions such as emissions reductions programs or adoption of low or zero-emission technology for drayage trucks, ocean-going vessels, rail, harbor craft, and cargo handling equipment.

Score	Min % of Points Received	Definition
Long Way to Go	0%	The port has repeatedly failed to adequately address the health of surrounding communities, and adverse impacts on air quality are not effectively mitigated. Air pollution is high, and there is no clear strategy for improvement.
Just Starting	50%	The port has developed approaches to support the health and environmental impacts on surrounding communities but has not yet implemented key actions. Air pollution reduction efforts may be inconsistent or lack comprehensive planning.
Making Progress	70%	The port has implemented some programs to minimize its environmental impact, reduce air pollution, and improve quality of life for surrounding communities.
Approaching Excellence	80%	The port has made significant progress in the implementation of programs that minimize its environmental impact, reduce air pollution, and improve quality of life for surrounding communities.
Gold Standard	90%	The port protects surrounding communities from the health and environmental impacts of operations through comprehensive and proactive mitigation measures. The port has successfully implemented practices to minimize environmental pollution and demonstrates a clear commitment to net-zero emissions and climate resilience.

#### **Category 4 Definitions: Community Engagement and Collaboration**

Evaluates the port's emission reduction actions for drayage trucks, ocean-going vessels, rail, harbor craft, and cargo handling equipment.

Score	Min % of Points Received	Definition
Long Way to Go	0%	The port rarely engages with surrounding communities.
Just Starting	50%	The port occasionally engages with surrounding communities but does not typically consider community input in planning and decision-making processes.
Making Progress	70%	The port occasionally or peripherally engages with surrounding communities but could do a lot more to inclusively and meaningfully engage community members in planning and decision-making processes.
Approaching Excellence	80%	The port engages with surrounding communities but could do more to inclusively and meaningfully engage community members in planning and decision-making processes.
Gold Standard	90%	The port engages with local communities, particularly surrounding low-income and environmentally impacted communities, through meaningful and inclusive collaboration on planning and decision-making processes.

#### **Overall Grading Scale**

Evaluates the port's overall score based on percentage of cumulative points earned in all four scoring categories.

Score	Min % of Points Received
Preparing to Launch	0%
Wharf in Progress	50%
Healthier Harbor	70%
Rising Star	80%
Clean Port Champion	90%