



SIERRA CLUB

MARYLAND CHAPTER

Sierra Club Maryland Chapter

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July 16, 2021

To: Change Maryland
PO Box 6559
Annapolis, MD 21404

We are writing to request that you cease and desist from the use of Sierra Club's name in your current ad campaign promoting Governor Hogan's proposed highway expansion. Further, we urge you to remove the ads completely, as they contain numerous, well-known inaccuracies.

We have also sent a letter to Facebook flagging these inaccuracies and urging them to flag these ads as "False News" under rule #20 of their community guidelines.¹

The ads, funded by Change Maryland, boost several posts from Governor Larry Hogan.

- <https://www.facebook.com/ads/library/?id=780784455965816>
- <https://www.facebook.com/ads/library/?id=536778140842279>
- <https://www.facebook.com/ads/library/?id=496171958336436>

The ads include several false news items and misuse of Sierra Club's name.

- Falsely claim that Governor Hogan's highway project will benefit the climate and reduce air pollution
- Falsely characterize Sierra Club view on the relationship between air pollution and highway expansion
- Falsely claim that removing Governor Hogan's highway project from the long range transportation plan puts at risk every project in the region

Below we have addressed each of these false claims, which are even in conflict with statements of his own administration, and demonstrated that Governor Hogan made false claims knowingly.

1. Three of the ads repeat a false claim that Governor Hogan has made on numerous occasions that highway expansion would "clean up our air"

That false claim was publicly debunked two years ago and many times since. In the [presolicitation report](#)² (12/2018) for this project, MDOT cited the work of Dr. Kai Zhang and Dr. Stuart Batterman of the University of Michigan, claiming that adding lanes would reduce congestion and therefore reduce

¹ Rule #20, Facebook Community Standards. https://www.facebook.com/communitystandards/false_news

² https://495-270-p3.com/wp-content/uploads/2018/12/PSR_Final_inc-Cover-Letter-1.pdf

air pollution. Dr. Batterman [contacted](#)³ the *Baltimore Sun*⁴ and stated that his work “should not be used to suggest environmental benefits” from the project. At the time, MDOT maintained that their model would show a reduction in ozone and greenhouse gas emissions.

However, following the July 10, 2020 release of the [Draft Environmental Impact Statement](#)⁵, they stopped making such a claim. In fact, Sierra Club and several of our partners demonstrated in our [expert comments](#)⁶ (11/6/2020, p. 72) that emission loading from additional vehicles traveling on the roadways due to this Project would serve to exacerbate existing pollutant concentrations.

2. Mischaracterization of Sierra Club’s position

The ads claim that “The Sierra Club and other leading environmental experts say that traffic is contributing to climate change” and then continue with the claim that “Governor Hogan’s plan will fix Montgomery County’s traffic crisis and clean up our air?”

As noted above, the Maryland Sierra Club has been clear that highway expansion does NOT clean the air or reduce climate pollution. Further, the Sierra Club has offered testimony on numerous occasions arguing that this project will not reduce air pollution, and on June 5, 2019, Sierra Club Maryland Chapter Director Josh Tulkin [testified](#)⁷ (p. 74-76) before the Board of Public Works on this topic. To use Sierra Club in these ads is deliberately misleading.

3. Misrepresenting Impact of Removing Project from the Long Range Transportation Plan

The ad claims that Montgomery County officials’ opposition is “*putting at risk every single project in their region.*” This claim was similarly exaggerated by Deputy Secretary Earl Lewis who claimed that opposition jeopardizes \$6 billion in private financing ([Letter](#), 6/21/2021)⁸ that would need to be replaced. MDOT Secretary Greg Slater corrected, on the record, that only \$1.5 billion, for repairs to the American Legion Bridge, would need to be made up for ([MD House/Senate Committee Hearing](#),⁹ 6/29/2021). This was most recently [reaffirmed](#)¹⁰ in a July 7, 2021 [letter](#)¹¹ from Deputy Secretary Lewis. It was further revealed by a [state legislator](#)¹² that the Hogan administration has not allocated funds in the next six years for 13 of the 15 projects anyway. Also, the [five](#)¹³ projects ultimately chosen

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<https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/maryland-chapter/Author%20of%20air%20pollution%20study%20refutes%20MDOT%20claim.pdf>

⁴ <https://bit.ly/3gLLAWg> <https://www.baltimoresun.com/news/environment/bs-md-highway-pollution-20190604-story.html>

⁵ <https://495-270-p3.com/deis/#DEIS>

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<https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u18365/2020-11-09-Comments%20on%20DEIS%2C%204%28f%29%2C%20and%20JPA%20%281%29%20%281%29.pdf>

⁷ <https://bpw.maryland.gov/MeetingDocs/2019-Jun-5-Transcript.pdf>

⁸ <https://www.marylandmatters.org/2021/06/22/mdot-vote-to-remove-highway-widening-imperils-other-transportation-projects/>

⁹ https://www.youtube.com/watch?v=spnk29zHIsE&t=11361s&ab_channel=MGA-APP

¹⁰ <https://twitter.com/mkorman/status/1413246341313138689>

¹¹ <https://www.washingtonpost.com/transportation/2021/07/08/maryland-beltway-toll-lanes/>

¹² <https://twitter.com/mkorman/status/1413246341313138689>

¹³ <https://twitter.com/mkorman/status/1415991308406169600>

for the chopping block received a grand total of zero dollars in funding in the current 6 year Consolidated Transportation Program.

These recent false news ads on Facebook follow earlier false Facebook ads from the same account run in both Maryland and Virginia [in March 2021](#)¹⁴, which claimed that under the Governor's plan all current lanes would remain free. Actually, 2 lanes which are currently HOV-2 for 3 hours per a day and otherwise open 21 hours a day ([MDOT](#)¹⁵, 2021), would be converted to HOT lanes which would only be accessible by paying a toll or HOV-3 ([MDTA Board Materials](#)¹⁶, 2/25/2021, p. 306, 331).

We ask that you remove Sierra Club's name from these ads immediately. Further, we urge you to remove the ads entirely given the contained falsehoods. It is not becoming of Governor Hogan to associate his name with this misinformation.

Thank you,

Joshua Tulkin
Director, Maryland Chapter
Sierra Club Maryland Chapter

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https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=US&q=%22change%20maryland%22%20hogan&search_type=keyword_unordered&media_type=all

¹⁵ <https://www.roads.maryland.gov/mdotsha/pages/Index.aspx?PageId=249>

¹⁶

https://mdta.maryland.gov/sites/default/files/Files/Meeting_Schedules/Meeting_Materials/2021_0225%20Board%20Materials%20-%20For%20Posting.pdf