



**NATIONAL ASSOCIATION OF STATE TRUST LANDS  
RESOLUTION 2025-0002**

**NATIONAL AMBIENT AIR QUALITY STANDARDS**

**Whereas**, the member states of the National Association of State Trust Lands (“NASTL”) are collectively the second largest landowner in the United States and manage trust lands, minerals, and waterways through their respective states; and

**Whereas**, members of NASTL have congressional and state constitutional mandates to manage millions of acres of lands for the multi-generational benefit of trust beneficiaries, including public education, through economic development, conservation, recreation, and other trust and public purposes as provided by their respective mandates; and

**Whereas**, NASTL member states fulfill their mandates to support multi-generational trust beneficiaries through an ongoing commitment to the long-term economic viability of trust assets under their management through the sustainable management of those trust assets – forestlands, real property, and mineral interests; and

**Whereas**, NASTL and its members proactively research and identify innovative economic opportunities that would advance sustainable asset management practices on state trust lands; and

**Whereas**, NASTL and its members support the United States Environmental Protection Agency’s recognition of the 2016 Exceptional Events Rule to establish criteria and procedures for use in determining if air quality monitoring data has been influenced by exceptional events; and

**Whereas**, the United States Environmental Protection Agency finalized a new Rule reducing the National Ambient Air Quality Standards for fine particulate matter (PM<sub>2.5</sub>) from 12 micrograms per cubic meter to 9 micrograms per cubic meter; and

**Whereas**, the revisions to and the implementation of the National Ambient Air Quality Standards final rule for fine particulate matter will restrain sustainable management activities of NASTL members, will reduce the economic potential of trust assets across all NASTL members, and halt the utilization of state trust lands for natural climate solutions; and

**Whereas**, a reduction of income and corresponding diminution of state trust land values will result in significant negative economic impact, both short-term and long-term, on state trust

lands administered by NASTL members negatively impacting the multi-generational beneficiaries of state trust lands, such as public-school children and other trust beneficiaries; and

**Whereas**, the revisions to the National Ambient Air Quality Standards for fine particulate matter ignores that a major cause of increased fine particulate matter is from the historic number of wildfires across the nation, and particularly in the West, including Alaska.

**Whereas**, many states and other organizations filed suit against the new standard and litigation is ongoing; and

**Whereas**, the current Administration and Environmental Protection Agency have committed to taking a new look at the 9 micrograms per cubic meter standard and have committed to reviewing the exceptional event Rule and its implementation.

**BE IT THEREFORE RESOLVED AS FOLLOWS:**

1. NASTL respectfully requests that the United States Environmental Protection Agency rescind the National Ambient Air Quality Standards final rule for fine particulate matter as discussed above and reinstate the National Ambient Air Quality Standards standard of 12 parts per cubic meter, as doing so will maintain NASTL members' abilities to effectively manage trust assets.
2. NASTL respectfully requests the United States Congress to enact legislation to prohibit United States Environmental Protection Agency from implementing National Ambient Air Quality Standards that will negatively impact the responsible development of state trust lands and therefore harm states' abilities to fund education.
3. NASTL respectfully requests the United States Congress to encourage local control and implementation of current standards by state agencies by emphasizing the United States Environmental Protection Agency's recognition of the 2016 Exceptional Events Rule for wildfire and prescribed fire emissions related air quality monitoring data. In doing so, the United States Congress will allow state environmental agencies to remove fire-related particulate-matter exceedances from monitoring data that may impact non-attainment determinations.
4. NASTL respectfully requests the United States Congress encourage the United States Environmental Protection Agency to recognize and implement the exceptional event determination process as it relates to determining whether air quality monitoring data has been influenced by exceptional events.

Adopted this 22nd day of July, 2025.



Charles Donohue  
President, NASTL



Deborah Cantu  
Secretary, NASTL

*This Resolution will remain in effect through July 31, 2027  
unless otherwise terminated, amended, or replaced by the Association.*