The standing rules apply to actions brought in *federal* courts, and they have no direct application to actions brought in state courts.[381]

Generalized or Widespread Injuries.—Persons do not have standing to sue in federal court when all they can claim is that they have an interest or have suffered an injury that is shared by all members of the public. Thus, a group of persons suing as citizens to litigate a contention that membership of Members of Congress in the military reserves constituted a violation of Article I, § 6, cl. 2, was denied standing.[382] "The only interest all citizens share in the claim advanced by respondents is one which presents injury in the abstract. . . . [The] claimed nonobservance [of the clause], standing alone, would adversely affect only the generalized interest of all citizens in constitutional governance."[383]

It is unclear, however, whether this rule against airing "generalized grievances" through the courts has a constitutional or a prudential basis[384] and thus can be modified by statute. And, despite the general rule that injury's shared by all citizens share is insufficient to confer standing, where a plaintiff alleges that the defendant's action injures him in "a concrete and personal way," "it does not matter how many [other] persons have [also] been injured. . . . [W]here a harm is concrete, though widely shared, the Court has found injury in fact."[385]

464, 475 (1982). "Generalizations about standing to sue are largely worthless as such." Association of Data Processing Service Orgs. v. Camp, 397 U.S. 150, 151 (1970). For extensive consideration of the doctrine, *see* Hart & Wechsler (6th ed.), supra at 100–183.

[381] Thus, state courts could adjudicate a case brought by a person who had no standing in the federal sense. If the plaintiff lost, he would have no recourse in the U.S. Supreme Court, because of his lack of standing, Tileston v. Ullman, 318 U.S. 44 (1943); Doremus v. Board of Education, 342 U.S. 429 (1952), but if plaintiff prevailed, the losing defendant might be able to appeal, because he might be able to assert sufficient injury to his federal interests. ASARCO Inc. v. Kadish, 490 U.S. 605 (1989).

[382] Schlesinger v. Reservists Comm. to Stop the War, 418 U.S. 208 (1974).

[383] 418 U.S. at 217. *See also* United States v. Richardson, 418 U.S. 166, 176–77 (1974); Valley Forge Christian College v. Americans United, 454 U.S. 464, 483 (1982); Allen v. Wright, 468 U.S. 737, 754 (1984); Whitmore v. Arkansas, 495 U.S. 149 (1990); Lujan v. Defenders of Wildlife, 504 U.S. 555, 573–77 (1992); Lance v. Coffman, 549 U.S. 437, 441 (2007) (per curiam). *Cf. Ex parte* Levitt, 302 U.S. 633 (1937); Laird v. Tatum, 408 U.S. 1 (1972).

[384] *Compare* Warth v. Seldin, 422 U.S. 490, 499–500 (1975) (prudential), *with* Valley Forge Christian College v. Americans United, 454 U.S. 464, 485, 490 (1982) (apparently constitutional). In Allen v. Wright, 468 U.S. 737, 751 (1984), it is again prudential.

[385] Massachusetts v. Environmental Protection Agency, 549 U.S. 497, 517, 522 (2007) (internal quotation marks omitted). In this case, "EPA maintain[ed] that because greenhouse gas emissions inflict widespread harm, the doctrine of standing