

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

STATE OF NEW YORK, et al.,)	
)	
Petitioners,)	Consolidated Nos.
)	14-1210, 14-1212,
vs.)	14-1216, 14-1217
)	
NUCLEAR REGULATORY)	
COMMISSION, and the UNITED)	MOTION FOR LEAVE TO
STATES OF AMERICA,)	PARTICIPATE AS AMICUS
)	CURIAE
Respondents.)	

Comes now the Sierra Club, pursuant to Federal Rule of Appellate Procedure 29 and Circuit Rule 29, and in support of this Motion for Leave to Participate as Amicus Curiae in support of the Petitioners, states to the Court as follows:

1. The Sierra Club is the nation's largest grassroots environmental organization with over 600,000 members. The Sierra Club supports sustainable energy alternatives (renewable energy and energy efficiency) that do not harm the environment. The Sierra Club opposes nuclear power because its fuel cycle from uranium mining to spent radioactive fuel poses grave dangers to the environment. In addition, reliance on nuclear power unjustifiably delays the beneficial transition to clean and renewable energy sources.

2. The Sierra Club submitted comments during the scoping process related to the Continued Storage Rule and

the Generic Environmental Impact Statement (GEIS) at issue in this case, submitted comments on the draft GEIS, and its members attended public hearings regarding these issues. So the Sierra Club has a direct interest in the issues in this case.

3. Pursuant to Circuit Rule 29(b), the Sierra Club represents that all other parties to these consolidated cases have consented to the Sierra Club's participation in this case as amicus curiae.

WHEREFORE, the Sierra Club requests permission to participate as amicus curiae in this case in support of the Petitioners.

/s/ *Wallace L. Taylor*

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CORPORATE DISCLOSURE STATEMENT

Pursuant to Fed. R. App. P. 26.1 and D.C. Cir. Rule 26.1, Amicus Curiae Sierra Club states that it is a nonprofit corporation whose general nature and purpose is environmental advocacy. Sierra Club has no parent company,

no publicly-traded company has a 10% or greater ownership interest in Sierra Club, and Sierra Club is not traded for profit.

/s/ *Wallace L. Taylor*
WALLACE L. TAYLOR