

ORAL ARGUMENT NOT YET SCHEDULED

NOS. 21-1048, 21-1055, 21-1056, 21-1179, 21-1227, 21-1229, 21-1230 and
21-1231

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

SIERRA CLUB, DON'T WASTE MICHIGAN, CITIZENS' ENVIRONMENTAL
COALITION, CITIZENS FOR ALTERNATIVES TO CHEMICAL
CONTAMINATION, NUCLEAR ENERGY INFORMATION SERVICE,
PUBLIC CITIZEN, INC., SAN LUIS OBISPO MOTHERS FOR PEACE,
SUSTAINABLE ENERGY AND ECONOMIC DEVELOPMENT COALITION,
and LEONA MORGAN,

Petitioners,

v.

UNITED STATES NUCLEAR REGULATORY COMMISSION and UNITED
STATES OF AMERICA,

Respondents.

On Petition for Review of a Decision of the United States Nuclear Regulatory
Commission

**NOTICE OF INTENT TO PARTICIPATION OF CITY OF FORT WORTH
AS AMICUS CURIAE IN SUPPORT OF PETITIONERS**

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RULE 26.1 DISCLOSURE STATEMENT

Amicus Curiae City of Fort Worth is a home-rule municipality in the State of Texas.

NOTICE OF INTENT TO FILE AN AMICUS CURIAE BRIEF

Pursuant to Federal Rule of Appellate Procedure 29(b) the City of Fort Worth hereby notifies this Court of the intent to file an amicus curiae brief in the above captioned matter in support of Petitioners.

The undersigned counsel for amicus curiae City of Fort Worth hereby represents that all parties in the above-referenced case consent to their participation as amicus curiae in support of Petitioners.

Pursuant to Circuit Rule 29(d), undersigned counsel for amicus curiae certifies that a separate brief is necessary because NRDC and the City of Fort Worth represent distinct interests with diverse knowledge bases. Whereas the City of Fort Worth is a local government concerned with the local impacts of an interim nuclear waste facility, NRDC is a nationwide environmental organization with expertise of the history of U.S. nuclear waste policy.

The City of Fort Worth (“City”) is a home-rule municipality in the State of Texas. The City has an immediate interest in this litigation because it is concerned that spent nuclear fuel will be transported by rail through Fort Worth to be stored at Interim Storage Partners’ Consolidated Interim Storage Facility in Andrews County

in West Texas. Fort Worth has a population of over 950,000, is the 12th largest city in the United States and has an extensive rail system.

The City of Fort Worth intends to file an amicus brief of no more than 6,500 words, addressing points not made by Petitioners, that will aid the Court's consideration of this case.

Respectfully submitted,

/s/ Christopher B. Mosley
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CERTIFICATE OF SERVICE

Pursuant to Fed. R. App. P. 25(d) and Cir. R. 25(a) I hereby certify that on the 24th day of March 2022, a true and correct copy of the foregoing instrument has been filed electronically using the Court's electronic case filing system, which will send a notification to the attorneys of record in this matter who are registered with the Court's CM/ECF system.

/s/ Christopher B. Mosley
CHRISTOPHER B. MOSLEY