

WINNEBAGO TRIBE OF NEBRASKA

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July 22, 2025

Woodbury County Board of Supervisors
Woodbury County Community and Economic Development
Attn: Daniel Priestley
Woodbury County Courthouse, 6th Floor
620 Douglas St.
Sioux City, IA 51101
dpriestley@woodburycountyiowa.gov

RE: Winnebago Tribe Comments on the Woodbury County Nuclear Power Usage Zoning Ordinance Update

Dear Board of Supervisors and Mr. Priestly:

The Winnebago Tribe is deeply concerned that Woodbury County is moving forward with proposed zoning changes that will permit future consideration of nuclear facilities. This action will impact the health, wellbeing, and federally protected water rights of the Winnebago Tribe. The Tribe previously expressed its interest and concerns in this matter in a letter to the Woodbury County Board on September 23, 2024. We would like that letter and these additional comments to be included and reviewed as public comments received. The Winnebago Tribe has land that is intimately connected to Woodbury County and has significant interest in any activity that may affect our tribal citizens. We request that the Tribe be included in all future communications to area governmental stakeholders and consulted in any decisions that might in any way impact the Winnebago people, lands, waters, and interests in surrounding communities.

We understand the proposed zoning changes will potentially pave the way for nuclear development in Woodbury County. Such development will necessarily endanger the surrounding communities, water resources and critical cultural and environmental resources - harming more than just the Winnebago people. Nuclear power and waste storage will not provide sustainable economic development and will harm efforts to produce diverse renewable power options that are readily available today. The Winnebago Tribe opposes any such development.

1. Background

Woodbury County has been considering the changes clarifying nuclear use zoning since early 2024 and the Winnebago Tribe learned of these considerations through press reports. In September 2024, the Tribe sent a letter to the Woodbury County Board of Supervisors, expressing the Tribe's interest and objection in the matter. The 1865 Treaty that established the Winnebago Reservation, by implication, secured rights and interests in the waters of the Missouri River sufficient to maintain the reservation. The Winnebago Reservation is located in Northeast Nebraska and Northwest Iowa, with land and significant financial assets within or near the boundaries of Woodbury County. The Missouri River runs through the Winnebago Reservation lands and runs along great portions of Woodbury County. With the recent return of land illegally taken by the Army Corps of Engineers, the local interests of the Tribe have only increased.

- There is still no solution to the problem of accumulating nuclear waste and waste stored at sites invariably leaking into the environment.
- Elevated radiation levels in the environment are particularly harmful to children, increasing the chances of cancer.
- Construction of nuclear plants invariably goes over budget, usually by more than a billion dollars.
- Renewable options are safe, plentiful in the region, and can be brought online more quickly and inexpensively.
- Decommissioning a nuclear plant is dangerous, expensive, and not commonly considered in the true costs of energy (making the power generated is more expensive than other sources of power).
- The inflexible necessities of nuclear power management monopolize power grids, preventing the expansion of more flexible renewable power sources into the same energy grid.
- This region of the country has been fortunate that it has significant flexible sources of power and this has permitted alternative energy to proliferate in the state; locking the power grid up with additional sources of nuclear power would only limit the expansion of these safe and healthy alternatives.

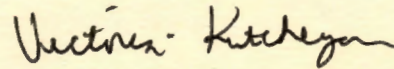
4. Key Environmental Concerns Identified

- Potential nuclear facility locations would fall within 100- and 500-year FEMA floodplains. Major Missouri River floods have occurred in 1993, 2008, 2011, and 2019—demonstrating the vulnerability of this site to water-related hazards.
- Potential cooling water withdrawal from the Missouri River could impact aquatic ecosystems and cultural water access. High-volume intake could reduce downstream flow, raise water temperatures, and harm aquatic species including pallid sturgeon and freshwater mussels, which are culturally and ecologically important.
- Proximity to sensitive habitats includes federally listed endangered species:
 - Pallid Sturgeon
 - Interior Least Tern
 - Piping Plover
 - Western Prairie Fringed Orchid
 - Whooping Crane
- Documented nuclear facility failures:
 - Fort Calhoun (NE, 2011) – Flooded by Missouri River, required shutdown and sandbagging.
 - Three Mile Island (PA, 1979) – Reactor meltdown due to equipment failure and human error
 - Davis-Besse (OH, 2002) – Severe corrosion discovered in reactor vessel head
 - Indian Point Energy Center (NY, 2015-2021) – Repeated safety violations and environmental protests
 - San Onofre Nuclear Station (CA, 2012) – Shutdown due to radiation leak from faulty steam

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Winnebago Tribal Council be included in notices for comment as a stakeholder in the outcomes and decisions of the Woodbury County in matters such as the current nuclear zoning proposal.

Respectfully,

A handwritten signature in black ink, appearing to read "Victoria Kitcheyan". The signature is fluid and cursive, with the first name "Victoria" and last name "Kitcheyan" clearly distinguishable.

Victoria Kitcheyan, Chairwoman
Winnebago Tribe of Nebraska