

Preliminary Public Notice – Impact to Floodplains & Wetlands

City of Bennington – Neumeyer Farm Park & Athletic Complex: Phase II Project

The City of Bennington (City) intends to seek financial assistance from the U.S. Department of Housing and Urban Development (HUD) for costs related to the development of the Neumeyer Farm Park & Athletic Complex: Phase II project. This phase of the project will add four additional regulation-sized, multi-purposed youth sports fields, additional sidewalks and trails, and create new parking areas while expanding upon existing lots. The completion of this phase will create a flexible layout that ensures recreational fields of different sizes can be adjusted for all ages and levels of competition, primarily for youth soccer and football. The athletic complex will be developed south of Bennington Road, along Kempten Creek Drive, between 156th Street and 161st Street, in Bennington, Douglas County, Nebraska.

If implemented, the proposed project will convert or effect 0.001 acres of the regulatory floodway and permanently impact 0.001 acres of Palustrine Emergent, Temporarily/Seasonally Flooded (PEMA/C) wetlands. The impacts to the regulatory floodway and wetlands will be from the construction of a drainage pipe outfall and associated rock riprap placed along Big Papillion Creek for stabilization and scour protection.

In accordance with Executive Order 11988 - Floodplain Management, Executive Order 11990 - Protection of Wetlands, and 24 Code of Federal Regulations 55.20(b), the City is notifying the interested public of this land conversion or impact, and to request comments concerning the proposal, alternative sites or actions that would avoid these impacts, and methods that could be used to minimize these impacts,

The environmental documentation regarding this proposal is available for review at 15505 Warehouse Street, Bennington, NE 68007, and on the news page of the city website (benningtonne.com). For questions regarding this proposal, contact John Bohrer, City of Bennington Director, by email at publicworks@bennington.com, or by phone at (402) 238-2375.

Any person interested in commenting on this proposal should submit comments to the mailing or email address above by February 09, 2026.

Publish: The Daily Record

January 21, 2026



FLOODPLAIN & WETLAND MEMORANDUM

To: Project File
From: Ray Montez, Environmental Senior Scientist, JEO Consulting Group
Date: January 21, 2026
Subject: City of Bennington – Neumeyer Farm Park & Athletic Complex: Phase II
24 CFR 55.20. Eight-Step Decision Making Process for Floodplain and Wetland Impacts

Executive Order 11988, in Section 2(a), outlines an eight-step decision-making process for floodplain impacts. Executive Order 11988 sets out the floodplain management decision-making process to be followed by the Agency for all actions involving new construction or substantial improvement in the floodplain. HUD has integrated Executive Order 11990 for protection of wetlands into this decision-making process.

Step 1. Determine if the proposed action is in a floodplain and/or wetland and has the potential for adverse effects. The City of Bennington is proposing the development of Phase II of the Neumeyer Farm & Park Athletic Complex. The proposed project (Site) is located south of Bennington Road along Kempton Creek Drive, between 156th and 161st Streets in Bennington, Douglas County, Nebraska. This Site is south of, and adjacent to Big Papillion Creek and north of Kempton Creek Drive (See attached **Figure 1**). This Site is mapped on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FRIM) panel 31055C0181J, effective date 03/25/2025. According to the FIRM, this Site is within the regulatory floodway, the 100-year floodplain (Zone AE), and the 500-year floodplain (Zone X). (See attached **Figure 2**)

The U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) was referenced for potential wetland and water resources within the study area. The Site did not exhibit any classified wetlands but does exhibit one riverine feature. Big Papillion Creek, located on the north of the Site, is classified as an intermittent, streambed, seasonally flooded, excavated Riverine (R4SBCx) (See attached **Figure 3**)

An onsite wetland delineation was completed for the Site on October 29, 2024 using the standard multi-parameter approach (vegetation, soils, and hydrology) for wetland identification. Based on this delineation, wetland resources were determined to be present. Approximately 0.431 acres of Palustrine, emergent, temporarily/seasonally flooded wetlands (PEMA/C) were identified and mapped at, and adjacent to the Site. Approximately 0.009 acres of PEM wetlands (Wetland B), 0.020 acres of PEM wetlands (Wetland C), and 0.010 acres of PEM wetlands (Wetland D) were identified to be present along the south bank of Big Papillion Creek on the north side of the Site. Approximately 0.237 acres of PEM wetlands were identified to be present within a swale that cuts through the Site in a north/south direction on the east side of the Site (Wetland E). Approximately 0.022 acres of PEM wetlands were identified to be present within a roadside drainage ditch on the east side of the Site and immediately west of N 156th Street. Other PEM wetlands (Wetland A) that total approximately 0.133 acres have been identified and mapped that are immediately north of the Site along the north bank of Big Papillion Creek (See attached **Figure 4**).

Based on the presence of both floodplains and wetlands at the Site, it has been determined that this project has the potential to affect or be affected by a floodplain or wetland.

Step 2. Preliminary Public Notice

The Preliminary Public Notice for Impacts to Floodplains & Wetlands was published to the local newspaper (*The Daily Record*) on the 21th of January 2026, providing a 14-day public comment period from the first date of publication. Proof of publication is attached.

Step 3. Search for Practicable Alternatives.

The City of Bennington is proposing to develop Phase II of the Neumeyer Farm & Park Athletic Complex to enhance recreational opportunities for its current and future residents and to propel economic development. The purpose of the proposed Project is to develop the next phase of a park that is designed to meet the health, youth development, and



community needs of a rapidly growing area. The long-term envisioned outcome of the Project is to increase recreational opportunities while supporting local economic development for the City of Bennington and for Nebraska's Second Congressional District (CD2). This proposed Phase II of the Project will complete the next group of reconfigurable fields in the planned outdoor youth sports complex, public park, and community gathering space. Additional, regulation-sized, multi-purposed youth sports fields, and additional sidewalk paths are proposed, along with expanding existing parking areas. The Project will complete a flexible layout that ensures fields of different sizes can be re-arranged for all ages and levels of competition, primarily youth soccer and football.

Three action alternatives, including a no action alternative, were considered in the design concepts of this project.

One alternative that was considered but not carried forward was a preliminary design concept that included sports fields and amenities to the north and south of Kempton Creek Drive. The design concept of this alternative included 5-120 ft x 200 ft soccer fields, and 2-210 ft x 360 ft soccer fields to the south of Kempton Creek Drive, along with 5-150 x 240 ft soccer fields, 3-210 ft x 330 ft soccer fields, 1-210 ft x 360 ft soccer field, 2-softball fields, 1-multi-aged playground, an 84,000 sf indoor sports facility, and a 45,000 sf community gathering plaza to the north of Kempton Creek Drive; with 182 on-street parking stalls and 521 off-street parking stalls. Fencing throughout is also proposed. This alternative was dismissed because the design and structures included in this alternative would have impacts to base flood elevations and floodplain mapping efforts would need to be implemented.

Another alternative that was considered but not carried forward was a second preliminary design concept that included sports fields and amenities north of Kempton Creek Drive. The design concept included 14-150 ft x 240 ft soccer fields, 1-210 ft x 360 ft soccer field, a two story 125,000 sf indoor sports facility/community gathering plaza, and a detention pond, with 692 off-street parking stalls. Walking path networks throughout the sports complex were also proposed with this alternative. This alternative was dismissed because the design structures included in this alternative would have impacts to base flood elevations and floodplain mapping efforts would need to be implemented. Additionally, the excessive size and cost of the indoor sport facility/community gathering plaza made it difficult to select for a practicable alternative.

The preferred improvements would consist of a design concept that would include sports fields and amenities to the north of Kempton Creek Drive. The design concept includes 5-225 ft x 360 ft reconfigurable soccer fields, a community gathering space with a centralized staging area, networked 10-ft walking paths throughout, 61 additional off-street parking stalls and 48 additional on-street parking stalls. To achieve proper site drainage, a 15-inch pipe will be buried underground, and inlets will be placed between the soccer fields to divert stormwater directly to Big Papillion Creek. An outfall will be established for the underground piping, and approximately 0.001-acres of rock riprap will be placed to protect the pipe and to prevent erosion at the outfall. No other structures aside from the underground pipe and outfall are proposed within the project area. This design concept is the preferred alternative because of the floodway and floodplain constraints. Avoiding the placement of aboveground structures ensures that no increases in floodway or floodplain elevation or widths would occur and floodplain mapping would not need to be revised.

A No Action Alternative was also considered but not carried forward due to the desire to complete Phase II of the Neumeyer Farm Park and Athletic Complex. The No Action alternative would not have any impact on floodplain or wetland resources; however, this alternative would fail to complete Phase II of the Neumeyer Farm Park and Athletic Complex.

Step 4. Identify Adverse Impacts and Beneficial Values/Functions.

The proposed project would occur along portions of Big Papillion Creek in Bennington, Nebraska. The proposed Site contains both wetlands and floodplains that are associated with Big Papillion Creek. No fill will be placed in the 100-year or 500-year floodplain. Fill will be placed in the regulatory floodway. An outfall structure will be placed along the northern portion of the Site to provide proper drainage of the soccer fields. The establishment of the outfall and placement of rock riprap will fill 0.001-acres at the Site (See attached Figure 5). A hydrologic and hydraulic analysis was performed in accordance with standard engineering practices. This analysis has determined that the proposed project will not result in increases in floodway or base flood elevations, and a No-Rise Certification will be obtained.

The development of the project will have minor, permanent impacts to wetland resources. Based on current design, it is anticipated that approximately 0.001 acres of permanent wetland impacts and 0.001 acres (24 linear feet) of permanent ordinary high-water mark (OHWM) impacts would occur at the Site from the establishment of the outfall and the placement

Step 5. Mitigate Adverse Impacts.

The proposed project has mitigated adverse impacts by designing Phase II of the Neumeyer Farm Park and Athletic Complex project in a way to minimize total impact area to the existing floodplain and wetlands. The improvements have been designed in such a way as to reduce the amount of fill placement and loss of wetlands, while the remainder of on-site wetlands are being preserved and integrated into the design. Riprap used for the storm drain outlet will be sized and placed to minimize floodplain and wetland impacts. The Neumeyer Farm Park and Athletic Complex will also be designed to comply with all Federal, State, and local floodplain regulations. To comply with Douglas County requirements, a local Floodplain Development Permit will be obtained, along with a No-Rise certification. Overall, the project will work to minimize and avoid impacts to the floodway, 100-year, and 500-year floodplains to the maximum extent practicable. A U.S. Army Corps of Engineers Section 404 Permit will be obtained for the proposed work in the wetlands and channel, and no compensatory mitigation is anticipated to be required.

The proposal will comply with the requirements of Executive Order 11988 - Floodplain Management and HUD Regulations in 24 Code of Federal Regulations Part 55. The improvements will be designed and constructed to be protected from 100- and 500-year flood hazards. The proposal will also comply with the requirements of the Nebraska Department of Water, Energy, and Environment (NDWEE) Construction Stormwater Permit, NDWEE National Pollutant Discharge Elimination System Permit, NDWEE Storm Water Discharge Permit, and the project's Storm Water Pollution Prevention Plan (SWPPP).

Step 6. Re-evaluate Alternatives.

HUD shall not act in a floodplain or wetlands unless it is the only practicable location. The No Action Alternative would not have any adverse impact on the floodplain or onsite wetlands; however, this alternative would not meet the needs of the City of Bennington to develop Phase II of the Neumeyer Farm Park and Athletic Complex. The City of Bennington has selected this Site for the development of the preferred alternative for Phase II of the Neumeyer Farm Park and Athletic Complex, and floodplain and wetland resources will be permanently converted by this preferred alternative. A storm drain outfall will be placed within a wetland on the northern side of the Site, and approximately 0.0006-acres of riparian wetlands will be permanently impacted by the placement of this outfall, which will include riprap for erosion control. Two design alternatives were considered for this Site, but were rejected due to larger, unavoidable impacts to floodplains and wetlands from the placement of additional structures. While the preferred alternative will place fill into floodplains and impact PEM wetlands, they will be minor in scale compared to the other alternatives. After re-evaluating the preferred alternative and its minor impacts to floodplains and wetlands, it has been determined that this alternative's impacts are unavoidable but will not disrupt floodplain and wetland values and/or functions. Therefore, the preferred alternative is practicable considering the information gathered in Steps 4 and 5.

Step 7. Final Public Notice.

The Final Notice for Impacts to Floodplains & Wetlands was published in the local newspaper on the 21^h of January, 2026. Proof of publication is attached.

Step 8. Implement Proposed Action with Appropriate Mitigation.

A draft Environmental Assessment (EA) and Environmental Report has been prepared for the proposed action. Approval of the EA is pending, along with any applicable permits and authorizations for the proposed action. Proposed construction will not commence until completion and approval of the EA and required permits, authorizations, and mitigation measures are issued. Should the impacts of the proposed action vary significantly from those evaluated in the EA, a supplement to the EA will be required.

JEO ARCHITECTURE INC

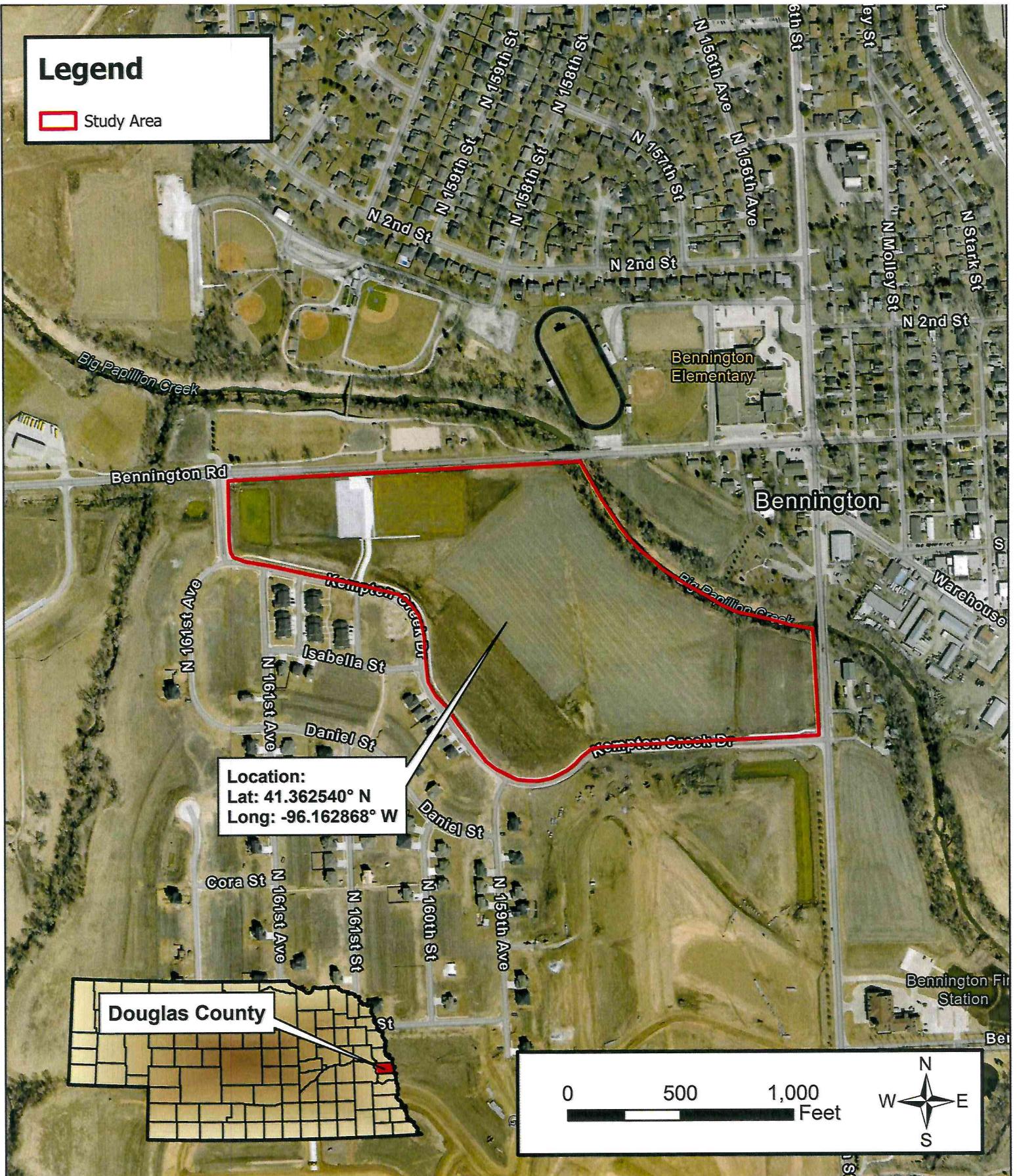
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Legend

Study Area



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Date: 12/12/2025
Software: ArcGIS Pro 3.5.4
File: Neumeyer Farm & Park Complex.aprx

Neumeyer Farm Park & Athletic Complex: Phase II

Figure 1 - Project Location Map
Douglas County, Nebraska

This map was prepared using information from record drawings supplied by JEO and/or other applicable city, county, federal, or public or private entities. JEO does not guarantee the accuracy of this map or the information used to prepare this map. This is not a scaled plat.



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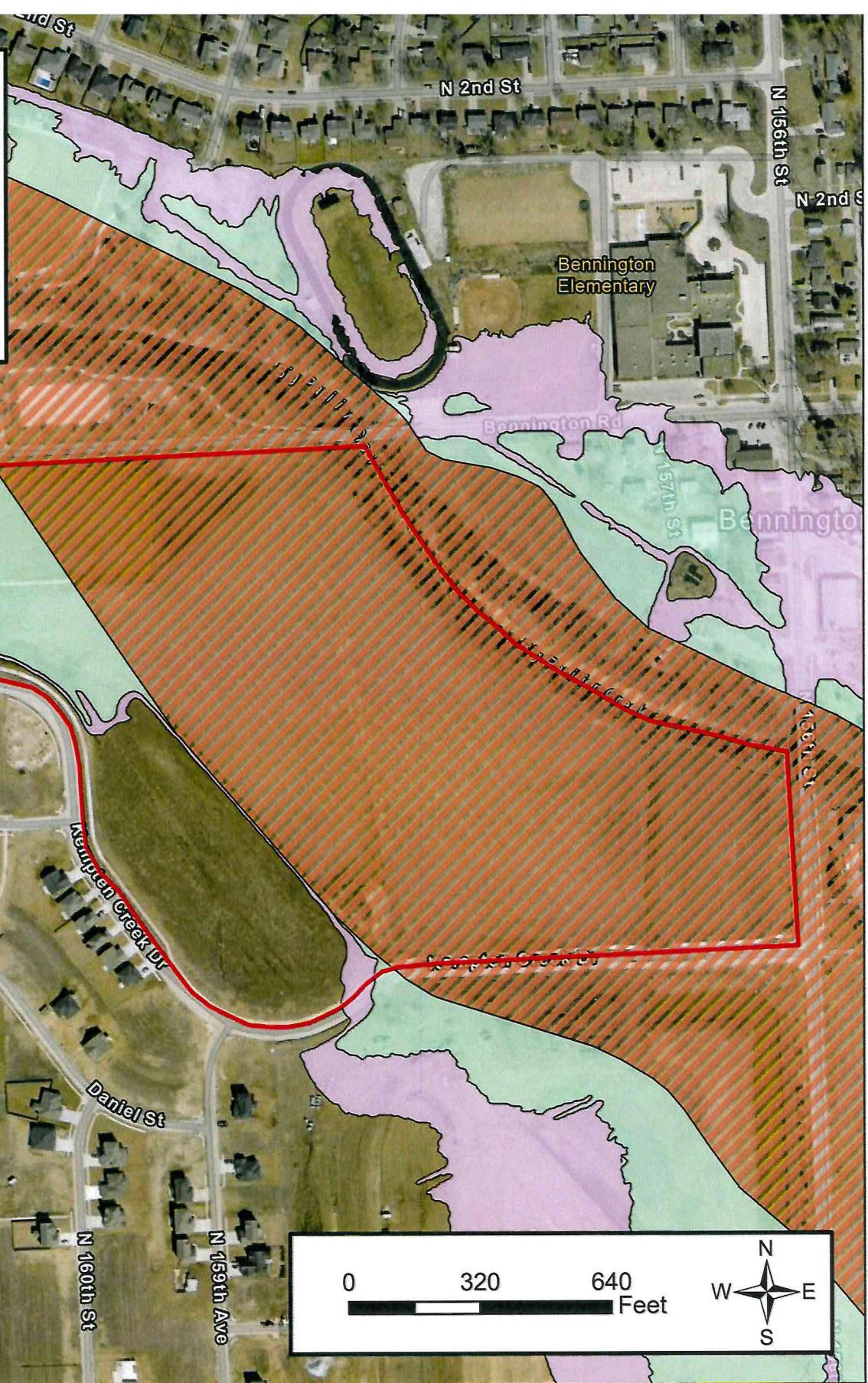
Study Area

Flood Hazard Areas

0.2% Annual Chance Flood Hazard

1% Annual Chance Flood Hazard

Regulatory Floodway



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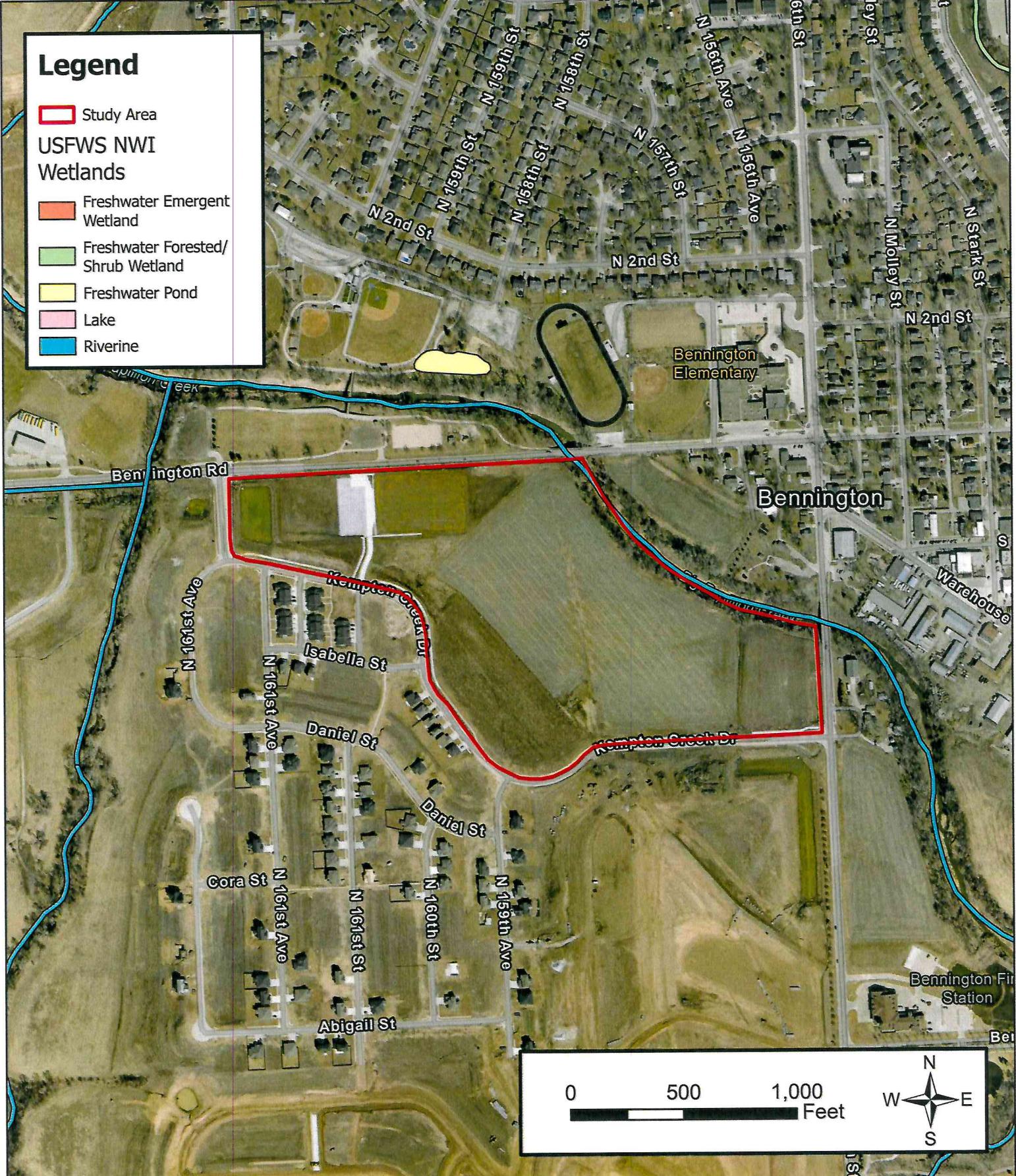
Neumeyer Farm Park & Athletic Complex: Phase II

Figure 2 - Flood Hazard Map
Douglas County, Nebraska



Legend

- Study Area
- USFWS NWI Wetlands
 - Freshwater Emergent Wetland
 - Freshwater Forested/ Shrub Wetland
 - Freshwater Pond
 - Lake
 - Riverine



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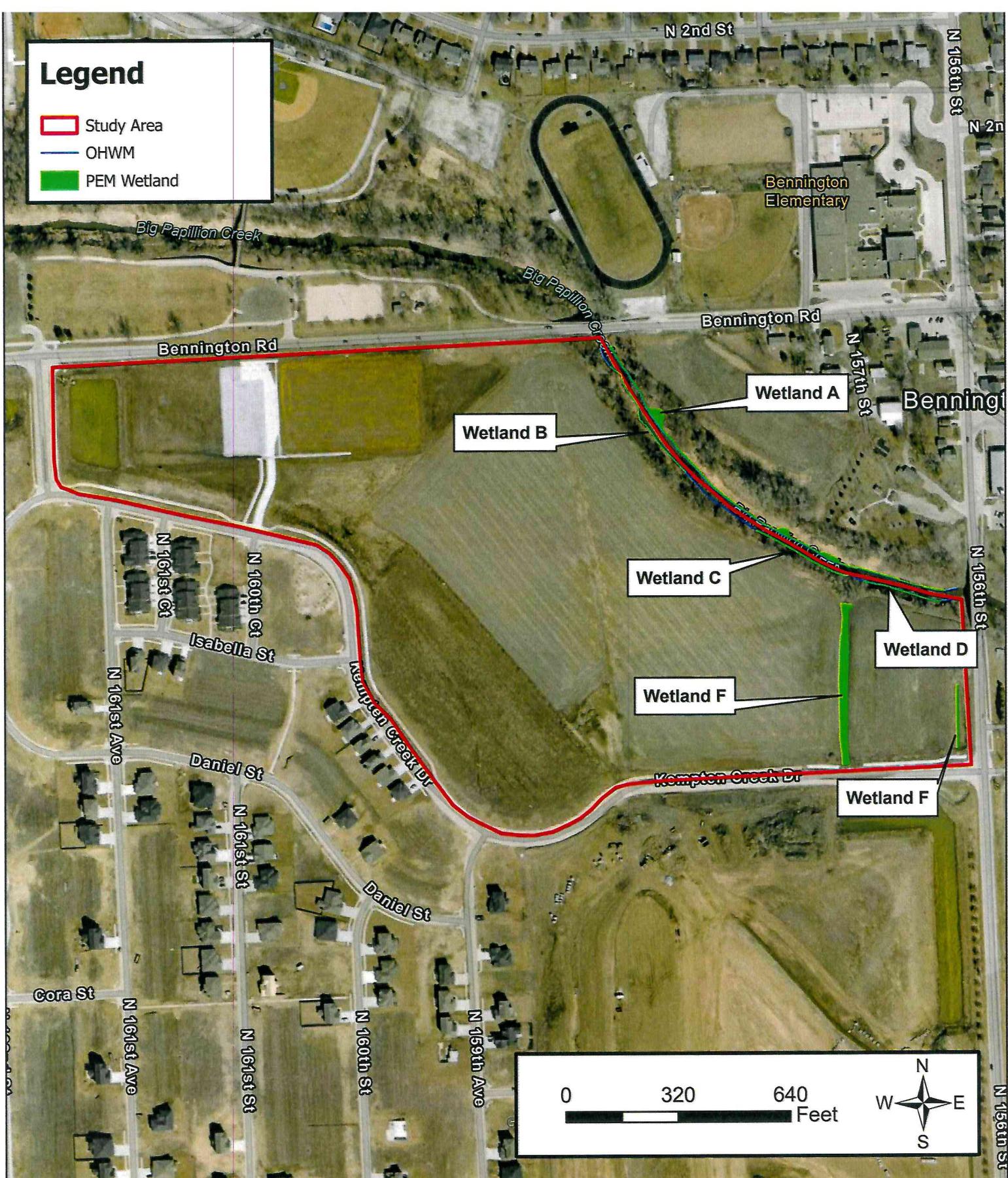
Neumeyer Farm Park & Athletic Complex: Phase II

Figure 3 - NWI Wetlands Map
Douglas County, Nebraska



Legend

- Study Area (Red Box)
- OHWM (Blue Line)
- PEM Wetland (Green Line)



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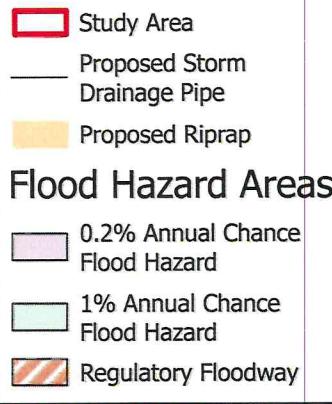
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Neumeyer Farm Park & Athletic Complex: Phase II

Figure 4 - Delineated Wetlands/WOTUS Map
 Douglas County, Nebraska



Legend



Floodplain Impacts:

Riprap = 0.001 acres

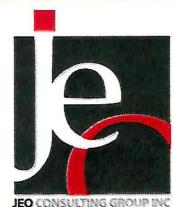


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Neumeyer Farm Park & Athletic Complex: Phase II

Figure 5 - Impacted Floodplains Map
Douglas County, Nebraska

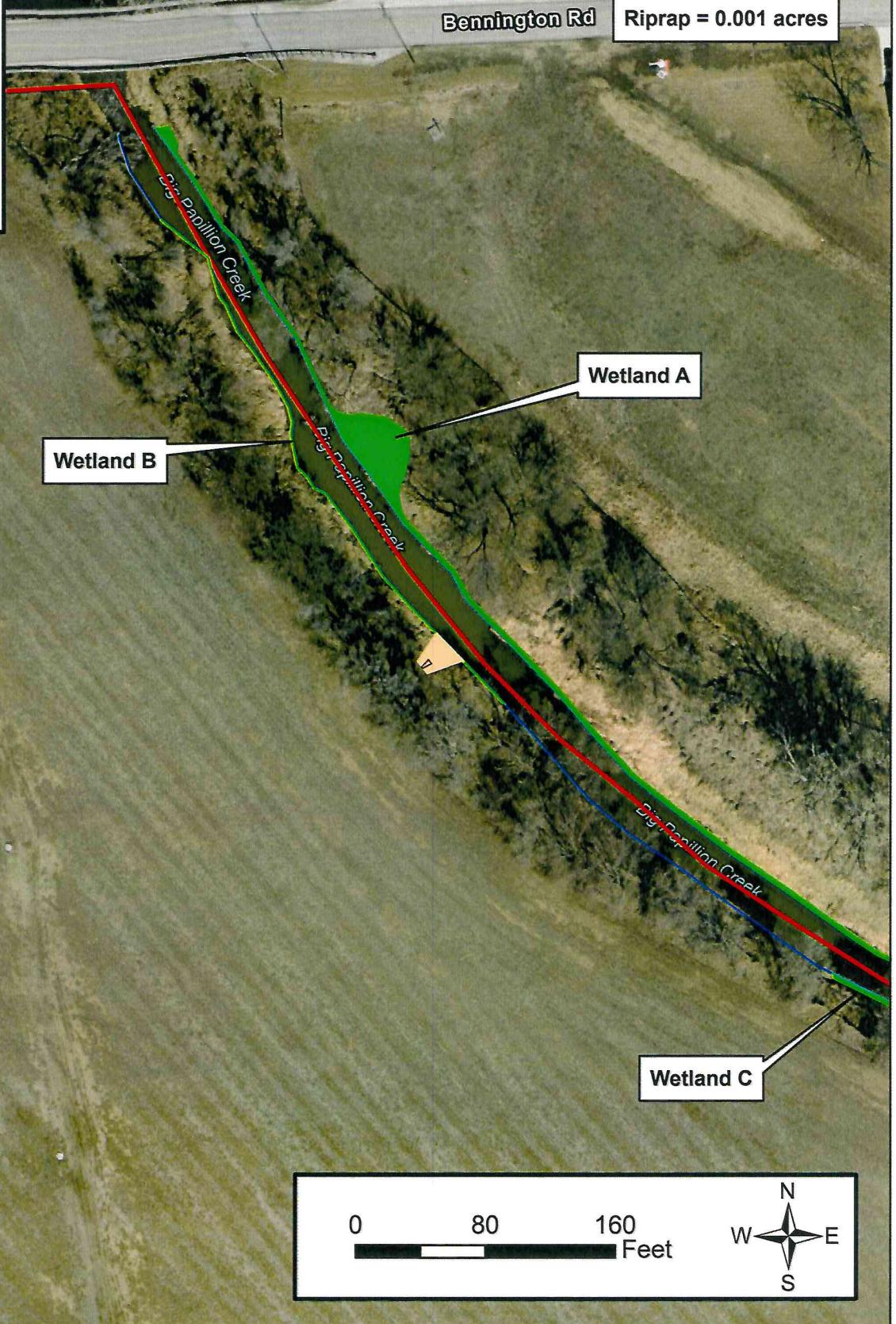


Legend

- Study Area
- OHWM
- PEM Wetland
- Proposed Riprap
- Proposed Storm Drainage Pipe

Wetland Impacts:

Riprap = 0.001 acres



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Date: 12/12/2025
Software: ArcGIS Pro 3.5.4
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Neumeyer Farm Park & Athletic Complex: Phase II

Figure 6 - Impacted Wetlands/WOTUS Map
Douglas County, Nebraska

