

**SUBJECT: ALLEGATIONS PROPOSED DRAFT PLAN
HYDROLOGICAL 2022-2027.
CYCLE 2022-2027**

TO THE HYDROGRAPHIC CONFEDERATION OF SEGURA

Mrs. / D. _____ with DNI
_____, with _____ home _____ site _____ in
_____, before this
Administration appears and as best proceeds in Law **HE SAYS**

1. That on June 22, 2021, an announcement was published in the Official State Gazette notifying the opening of the period of public consultation of the documents "*Hydrological plan project proposal*" Y "*Strategic Environmental Study*" of the hydrological planning process 2022-2027 corresponding to the SEGURA Hydrographic Demarcation. With this announcement a period of 6 months begins so that any interested person can contribute, contribute or add the appropriate suggestions.
2. That taking into account the possibility of alleging the **PROPOSED HYDROLOGICAL PLAN PROPOSAL 2022-2027** hereby the following are to be carried out

ALLEGATIONS

The object of these contributions to the public exhibition of the proposed Hydrological Plan Project of the Segura Hydrological Demarcation 2022-2027 are, in a special way, the measures contained therein that are linked to the management of runoff and its relationship with the populations and the affection of the Mar Menor and its region.

INITIAL CONSIDERATIONS

All this to avoid replacing the existing situation before construction was carried out in the floodplain areas located in the evacuation areas of the boulevards of the municipality of Los Alcázares. The most logical thing would have been to study the repercussions that would have had of restoring these boulevards and their areas of influence to the state prior to their occupation (as promoted by art. 28 of the PHN), although this option has not been contemplated or studied, that it is known, in the Basin Plan that it is subject to exposure or in any of its complementary documents, such referred objective being affected, Since there is no harmonization or balance whatsoever in the measures adopted, the people affected by the aforementioned measures of the PGRI draft document being affected exclusively by the problems of flooding in Los Alcázares; The people whose buildings are located next to the boulevards and their aforementioned areas of influence have not been counted on to share with them the damages derived from the proposed measures. Without prejudice to this, the lack of development of measures for the defense and recovery of the DPH of the floodplain areas that have been urbanized in the surroundings of the Mar Menor could come to violate the first of the objectives set out in art. 40.1 (achieve adequate protection of the public hydraulic domain). The people whose buildings are located next to the boulevards and their aforementioned areas of influence have not been counted on to share with them the damages derived from the proposed measures. Without prejudice to this, the lack of development of measures for the defense and recovery of the DPH of the floodplain areas that have been urbanized in the surroundings of the Mar Menor could come to violate the first of the objectives set out in art. 40.1 (achieve adequate protection of the public hydraulic domain). The people whose buildings are located next to the boulevards and their aforementioned areas of influence have not been counted on to share with them the damages derived from the proposed measures. Without prejudice to this, the lack of development of measures for the defense and recovery of the DPH of the floodplain areas that have been urbanized in the surroundings of the Mar Menor could come to violate the first of the objectives set out in art. 40.1 (achieve adequate protection of the public hydraulic domain). the lack of development of measures for the defense and recovery of the DPH of the flood zones that have been urbanized in the surroundings of the Mar Menor could come to violate the first of the objectives collected by art. 40.1 (achieve adequate protection of the public hydraulic domain). the lack of development of measures for the defense and recovery of the DPH of the flood zones that have been urbanized in the surroundings of the Mar Menor could come to violate the first of the objectives collected by art. 40.1 (achieve adequate protection of the public hydraulic domain).

■. The Segura Hydrographic Confederation has promoted the "PROJECT TO INCREASE THE HYDRAULIC CAPACITY OF THE D-7 AGRICULTURAL DRAINAGE OF THE CARTAGENA FIELD. REPOSITION OF SERVICES OF THE TRANSVERSAL DRAINAGE WORK UNDER THE RM F30 ROAD. TM LOS ALCÁZARES (MURCIA)". In ANNEX 6 of the Report in point 3.1 "PROBLEMATICS OF THE EXISTING RIVES" regarding the Rambla de la Pescadería (natural mouth of the Rambla de la Maraña) it is stated textually: "*The natural channel of this boulevard has been totally*

altered, with only a small section of channeling in an urban area, downstream from Las Peñas Huertanas Park, characterized mainly by an open section with low side walls and access by stairs. In this area, part of the flow of the Rambla La Maraña converge, and the different flows of diffuse runoff that descend from the Cabezo Gordo, and flow through the fields, cross the AP-7 Highway through the transversal drainage works, flood again the fields of cultivation, and they appear in a torrential way once they are channeled through the roads of the urban area. Since the current channeling of the Rambla de Pescadería is quite unconfigured and without an efficient section, the water seeks as evacuation points the different streets, giving rise to the overflow of the Rambla de la Pescadería at its mouth and the generation of a large floodplain area. In addition, in the channeling section itself, downstream of the existing 9-eye bridge, a narrowing of the existing drainage section is generated, which makes drainage of the area more complex and increases the problems of the urban environment, and mainly of what could be called the historic center of the municipality. "

between the RM F26 road and the RM F30 road at an elevation of 15 meters above sea level with a raised speck of the ground that has to create a dam for the sheet of water capable of making it flow towards the Lomas de Rame area through a channel that runs parallel to the AP-7 upstream from it and next to the urban area. This action generates a significant increase in the risk of flooding in Las Lomas de Rame, Torre de Rame and the rest of the populated areas of the southern area of Los Alcázares and towns in the municipality of Cartagena due to the effect of the flood zone of the Rambla del Albuñón and the dam effect of the AP-7. Effects recognized and revealed by the CHS itself in ANNEX No. 6. "STUDY OF ALTERNATIVES AND SOLUTION ADOPTED" of the PROJECT FOR Torre de Rame and the rest of the populated areas in the southern area of Los Alcázares and towns in the municipality of Cartagena due to the effect of the flood zone of the Albuñón Rambla and the dam effect of the AP-7. Effects recognized and revealed by the CHS itself in ANNEX No. 6. "STUDY OF ALTERNATIVES AND SOLUTION ADOPTED" of the PROJECT FOR Torre de Rame and the rest of the populated areas in the southern area of Los Alcázares and towns in the municipality of Cartagena due to the effect of the flood zone of the Albuñón Rambla and the dam effect of the AP-7. Effects recognized and revealed by the CHS itself in ANNEX No. 6. "STUDY OF ALTERNATIVES AND SOLUTION ADOPTED" of the PROJECT FOR

INCREASE THE HYDRAULIC CAPACITY OF THE D-7 AGRICULTURAL DRAINAGE OF THE CARTAGENA FIELD. REPOSITION OF SERVICES OF THE TRANSVERSAL DRAINAGE WORK UNDER THE RM F30 ROAD. TM LOS ALCÁZARES (MURCIA) as referred to in the following extract:

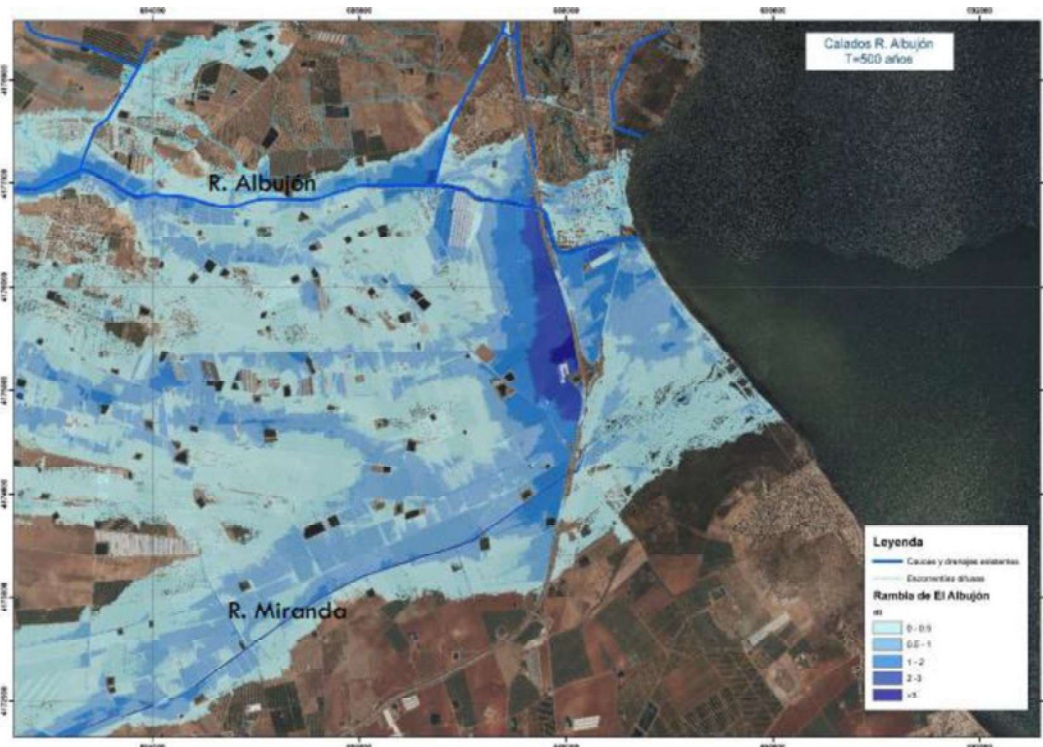


Figura 3-13. Plano de calados para la Rambla de El Albuñón y la Rambla de Miranda. SNCZI

Como puede verse en la imagen anterior, se observa claramente el efecto de retención que genera el talud de la autopista AP7 sobre el flujo desbordado de la Rambla de El Albuñón y la Rambla de Miranda (más al sur). Este efecto de almacenamiento en la zona donde desagua el D7 alcanza calados superiores a los 2 m para el periodo de retorno de 500 años.

Due to the foregoing, it is not possible to understand that, apparently, the increase in flooding is not contemplated in any of the cases due to the effect that the AP-7 slope generates on the houses upstream of it.

In this same sense, the "speck" that intercepts the overflowing flows in the preferential flow zone of La Maraña must have a length greater than 2000 meters in a transverse direction to this same preferential flow zone and at an elevation of 15 m as mentioned. The volume of water that this bagging will generate must be very important and the upstream effect, simply due to the topography of the land, will cause damage, even reaching the municipality of Torre-Pacheco. In addition, as mentioned, it only moves the problem to Lomas de Rame, Torre de Rame, Bahía Bella and other surrounding areas.



FIGURE 3. Level lines at level 13, 14 and 15 meters

In Memory of the PROJECT TO INCREASE THE HYDRAULIC CAPACITY OF THE D-7 AGRICULTURAL DRAINAGE OF THE CARTAGENA FIELD. RUNOFF CHANNEL IN AVENUE FERNANDO MUÑOZ ZAMBUDIO AND ALEDAÑOS. TM LOS ALCÁZARES (MURCIA), its point 3.3 STUDY OF SOLUTIONS literally quotes:

↔ " *The runoff transportation system that captures much of this diffuse water uncontrolled, as there are no others, is the **agricultural drainage channel D7**, that it was not originally intended for this purpose, which is why it presents a clearly insufficient section to assume the peak flows that can occur at the different points of its layout, and it is also configured as a **conditioned hydraulic drainage system**, with a very low slope, sections on the opposite slope and critical narrowing points such as the one generated in the roundabout area under the RM F 30.*

↔ *The closest riverbed, which is the Rambla de El Albuñón, does not have enough section to evacuate flood flows with low return periods, even less than 20 years, therefore, in avenue episodes, and taking into account that in the area near its upstream of the highway, the right bank is higher than the left, which aggravates the dam effect of the highway, by generating the Rambla de El Albuñón an extensive flood sheet that prevents any drainage into it and causes its see the backwater upstream, and therefore the flow head towards Los Alcázares. "*

From this quote it can be deduced that the approach presented by the CHS of the 1895 measure of the PdM has not been sufficiently studied given the situation that the channeling of the Albuji3n itself, the configuration of the AP-7 route and the topographic configuration of the zone would generate this solution.



FIGURE 4. Detail of Maraña ZFP without including overflowing flows from La Colonia in Los Alc3zares.



FIGURE 5. Preferential flow zones of the Ramblas de la Maraña and el Albuji3n. Lomas de Rame is not affected by the Rambla de la Maraña and only the Rambla del Albuji3n.

This has made the population of Las Lomas del Rame alarmed by the consequences that could derive from such actions to mobilize against them.





CONSIDERATIONS AND PROPOSALS

■.Regarding the **flood risk** cites the Memory:

For the actions included in the Program of Measures, to the extent that the current urban layout of Los Alcázares may require the adaptation of these to it, the use of "gray" structural infrastructures is considered a convenient possibility, seeking with it, yes, maximum efficiency in safeguarding people and in reducing risk, following the route closest to the line of maximum slope of the land and the most coinciding with the natural channel of the Rambla de La Maraña that ends at the Rambla from La Pescadería.

According to the Instruction of the Secretary of State of July 8, 2020, in its Second section. - Protection measures against the risk of flooding, it is quoted verbatim: "*In accordance with Royal Decree 903/2010, of July 9, on the evaluation and management of flood risks, preventive measures should be prioritized for risk management, avoiding the occupation of flood-prone areas with structures or buildings that increase the exposure, vulnerability and danger. Through the flood protection works, an attempt will be made to increase the space of the channel and, in no case, will the flooding and the pre-existing risk upstream and downstream of the action be aggravated.*" With the measures proposed in the PGRI, the CHS renounces to recover the space that in its day occupied the Rambla de la Maraña or to propose a viable alternative route including the urban area

from Los Alcázares. However, it proposes some catchment structures based on moses in the Pre-existing Flow Zone of the Rambla de la Maraña, which in the event of a breakdown or breakage could aggravate flooding and the pre-existing risk downstream. The second section of the Instruction continues to quote: "*Actions that, in addition to reducing the risk of flooding, help to achieve or maintain the environmental objectives set in hydrological planning, through river restoration and the recovery of alluvial areas to improve the lamination conditions and natural water retention, will be prioritized. all of this in coordination with the environmental objectives set by the river basin management plans*" However, the measures proposed for the lamination and natural retention of water in the upper part and in the middle part of the watershed of the Rambla de la Maraña are apparently insufficient and unrelated, since significant volumes of runoff should be retained. and significant for the episodes of intense or torrential rains that usually affect this area, as has been seen in recent years; and in any case, prior to having proposed measures such as "green corridors", it should have been considered, according to the studies commissioned by the basin body to the UPCT, the location in middle areas and the channeling in low areas and always after modeling the entire system to know if it will work in a comprehensive manner, becoming then and only then infrastructures that respond effectively to these objectives that should be marked in hydrological planning.

IT IS REQUESTED (except in this case) that measures 1816 and 1895 be withdrawn, included among those called structural in the draft document of the PGRI that affect the Mar Menor, as they are measures in which they are also "envisaged".

At the same time, the Basin Organization IS REQUESTED that in the event that all analyzes and studies are completed, and always taking into account the possible alternatives that may arise from being incorporated after the public presentation of the draft PGRI document and may oblige to new studies and analyzes, that all these studies be incorporated into the definitive documentation of the PGRI and if this is not the case, those of measure 1895 be sent to me as it is affected by such measure. IT IS PROPOSED to the Basin Organization regarding the measures :

1816. Study of economic, technical and environmental feasibility of the green corridor for channeling surface runoff in flood episodes, and sustainable urban drainage systems for the protection of the northern area of the urban area of Los Alcázares. 1895. Study of economic, technical and environmental feasibility and, where appropriate, execution of the Green Corridor for the channeling of surface runoff in flood episodes, and urban systems of sustainable drainage for the protection of the central and southern areas of the urban area of Los Alcázares

consider the normative precepts included in the aforementioned "INSTRUCTION OF THE SECRETARY OF STATE FOR THE ENVIRONMENT FOR THE DEVELOPMENT OF ACTIONS OF CONSERVATION, PROTECTION AND RECOVERY IN STREAMS OF PUBLIC HYDRAULIC DOMAIN IN THE TERRITORIAL FIELD OF THE HYDROGRAPHIC CONFEDERATIONS" to include in the previous HYDROGRAPHIC CONFEDERATIONS study. feasibility of both measures the alternative that emanates from the application of the same: **RECOVERY OF THE MARAÑA STREAM UNTIL ITS EXIT TO THE SEA THROUGH ITS NATURAL MOUTH IN THE RAMBLA DE LA**

FISHERIES (LOS ALCÁZARES) from in a coordinated manner with the rest of the administrations and under the principles of article 11 of RD 903/2010, of July 9, of evaluation and management of flood risks, especially understanding solidarity in this case as not trying to transfer the problem generated at one point to other places, which they would be equally affected.

Taking into account that the area in which they intend to build what they call SUD affected by the measures 1816 and 1895 are located above the Quaternary Aquifer, this would only increase the amount of water filtered into it and through it transferred to the Mar Menor delaying at least the urgent recovery of the same and that in turn affects the economy of the coastal towns and by extension of the entire Autonomous Community of Murcia.

Another important reason to take into account is that the area of the municipality of Los Alcázares is very small and with these measures they significantly limit its growth, affecting future generations.

REQUESTED

That the study of the watershed of the Rambla de La Maraña be included as a measure in the Program of Measures that addresses in an integral way the recovery of its natural channel by grouping the measures:

2099 Runoff channeling on Fernando Muñoz Zambudio avenue and surrounding areas. TM Los Alcázares (Murcia)

1893 Economic, technical and environmental feasibility study of actions for laminating avenues through controlled storage areas and urban sustainable drainage systems in the Rambla de La Maraña basin

1002 Hydrological-forestry restoration of the headwaters of the Mar Menor watersheds and flooded areas of the demarcation and for the sustainable forest management of public forests, based on reforestation, silvicultural treatments and hydrology works under the jurisdiction of the Region of Murcia

that together with the priority delimitation of the DPH of the section of the Rambla de la Maraña that allows the connection of the crossing with the post-transfer canal with the action of measure 2099 Channeling of runoff in the Fernando Muñoz Zambudio avenue and surrounding areas. TM Los Alcázares (Murcia) mentioned leads to achieving an effective lamination together with a retention of sediments that minimizes the risk of flooding in the best way and is an effective measure in defense of the Mar Menor.

That the necessary measures be adopted for the delimitation and canalization of the Ramblas of La Maraña and El Albuñon and the construction of reservoirs in the middle and upper areas of the mentioned Ramblas and with sufficient capacity to regulate the masses of water that cause damage to the DANA episodes. These reservoirs administered and managed by the Segura Hydrographic Confederation would be very beneficial for the use of the water that is so much needed in the agriculture of the Region, avoiding that it is wasted in the Mar Menor that would not do anything other than damage the ecosystem even more avoiding the In the same way, expenses to the administration for the insurance that the Compensation Consortium had to pay, advocating in this way for a prompt recovery of the Mar Menor and all the people who depend on it (Tourism, commerce, hospitality,

fishermen....) and avoiding situations of stress and psychological damage in the inhabitants of the municipalities affected by the floods every time the AEMET decrees alerts in this zone.

For all this,

TO THE HYDROGRAPHIC CONFEDERATION OF THE REQUESTED INSURANCE That considering these **CLAIMS TO THE PROPOSED HYDROLOGICAL PLAN PROPOSAL 2022-2027**, they are taken into account, proceeding to modify the Project in accordance with the allegations raised.