

June 17, 2026

Director Karen Peters
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, Arizona 85007

Patrice Horstman
District 1
Chair

Dear Director Peters:

On behalf of the Coconino County Board of Supervisors, I write regarding the proposed amendment to Aquifer Protection Permit No. P-100333 for the Pinyon Plain Mine, which would increase the Aquifer Quality Limit (AQL) for dissolved arsenic at Monitoring Well MW-02 (CYN-POC-02) from 50 µg/L to 55 µg/L.

Jeronimo Vasquez
District 2
Vice Chair

It has come to the County's attention that ADEQ may be considering this request as a minor amendment that would not require notice and public comment before approval. Given the significance of the issues involved, the Board believes this proposal warrants a full amendment process that includes public notice and an opportunity for public comment.

Tammy Ontiveros
District 3

Judy Begay
District 4

Coconino County has received concerns from residents throughout the region, including residents of Supai Village, regarding the proposed increase in allowable arsenic levels. These concerns are heightened by the fact that arsenic concentrations at the monitoring well exceeded established alert levels in January 2025. The County has also reviewed reports prepared by respected hydrogeologists and groundwater experts that raise questions about whether the increasing arsenic concentrations can be attributed solely to naturally occurring conditions.

Lena Fowler
District 5

The Board recognizes that the elevated arsenic concentrations may ultimately be attributable to natural geologic conditions. If that is the case, a thorough review should be able to demonstrate it. Given the importance of the groundwater resources at issue, the cause of the increased concentration should be fully evaluated before ADEQ considers modifying the groundwater protection standards established under the permit.

This need for certainty is particularly important because the mine sits above the Redwall-Muav Aquifer, which feeds seeps and springs throughout the Grand Canyon, contributes flow to Havasu Creek, and serves as the sole source of drinking water for the people of Supai. Because these resources are so significant, permit limits should not be revised until ADEQ has a clear understanding of what is driving the increasing arsenic concentrations and can confidently conclude that groundwater resources remain protected.

We respectfully request that ADEQ conduct a full review of the proposed amendment, provide notice and an opportunity for public comment, and carefully evaluate the scientific evidence regarding the source of the elevated arsenic concentrations before making a final determination.

Thank you for your consideration and for your continued commitment to protecting Arizona's groundwater resources.



Patrice Horstman, Chair
Coconino County Board of Supervisors