Mark R. Bridwell Vice President, General Counsel and Corporate Secretary Rayonier Inc. 1 Rayonier Way Wildlight, FL 32097

> Re: Rayonier Inc. Registration Statement on Form S-4 Filed March 17, 2020 File No. 333-237246

Dear Mr. Bridwell:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Ronald (Ron) Alper at 202-551-3329 with any questions.

Sincerely, Division of Office of Real

Corporation Finance

Estate & Construction cc: David K. Lam