

Rayonier

Thank you for the opportunity to provide the Department of Ecology our concerns with Tier III Outstanding Resource Water (ORS). I am writing on behalf of Rayonier. Rayonier was founded in 1926 in Shelton, Washington. Rayonier is responsible for practicing sustainable forestry on 2.8 million acres in the United States and New Zealand. We currently own over 400 thousand acres in Washington. Rayonier's Working Forests support more than 11,000 rural jobs in WA. We strive to be a good neighbor, investing in communities we operate in and working together with neighboring tribes to solve problems. We take the long-term view looking out over multiple future rotations of trees within our forests, bringing a long-term mind-set to managing our resources.

We are asking you to please postpone any designations of Tier III waters until clear transparency has been met. Given that this is the first time ever that Ecology is designating these waters, a very high standard and clear and specific information should be available so we can have both meaningful public participation and transparent analysis. Right now there is a lack of sufficient water quality data to support the designations and the benefits of this proposal are unclear since many of the waters already have protection. There will be significant economic impacts, the environmental impact on land and shoreline use is undisclosed, and the potential restriction of human activities without adequate public and legislative approval is troubling. We urge the Department of Ecology to pause the rulemaking, conduct thorough and transparent analysis with site-specific data, and consider public input to ensure benefits outweigh costs and regain public confidence in the rule-making process.

Ecology needs to provide a transparent process. Please pause this proposed rulemaking until transparent, objective, and robust analysis is conducted. Ecology should not designate these waters without giving the public clear and direct information about how it is making these designations, the costs of designation, and the implications for local communities.

Thank you for your consideration.