

Mail Stop 3010

March 4, 2010

Mr. William H. McMunn  
President and Chief Executive Officer  
Consolidated-Tomoka Land Co.  
1530 Cornerstone Boulevard, Suite 100  
Daytona Beach, FL 32117

**Re: Consolidated-Tomoka Land Co.  
Form 10-K for the Year Ended December 31, 2008  
Forms 10-Q for the Periods Ended March 31, June 30, and September  
30, 2009  
Schedule 14A filed April 22, 2009  
File No. 1-11350**

Dear Mr. McMunn:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Daniel L. Gordon  
Branch Chief