

Mail Stop 4561

May 22, 2007

Mr. Peter S. Rummell
Chief Executive Officer
The St. Joe Company
245 Riverside Avenue, Suite 500
Jacksonville, FL 32202

**Re: The St. Joe Company
Form 10-K for Fiscal Year Ended December 31, 2006
Filed February 28, 2007
File No. 1-10466**

Dear Mr. Rummell:

We have completed our review of your Form 10-K and do not, at this time, have any further comments.

Sincerely,

Kevin Woody
Accounting Branch Chief