



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

September 1, 2010

Via U.S. Mail and Facsimile 904.301.4243

William S. McCalmont
Chief Financial 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, 2009
Filed February 23, 2010
Schedule 14A
Filed March 29, 2010
File No. 1-10466

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Kevin Woody
Accounting Branch Chief