



DIVISION OF  
CORPORATION FINANCE

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

December 2, 2022

Marek Bakun  
Executive Vice President and Chief Financial Officer  
The St. Joe Company  
130 Richard Jackson Boulevard , Suite 200  
Panama City Beach , FL 32407

**Re: The St. Joe Company**  
**Form 10-K for the year ended December 31, 2022**  
**File No. 001-10466**

Dear Marek Bakun:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction