

## NELSON MULLINS RILEY & SCARBOROUGH LLP ATTORNEYS AND COUNSELORS AT LAW

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January 2, 2024

## VIA EDGAR

Division of Corporation Finance Office of Real Estate & Construction U.S. Securities and Exchange Commission 100 F Street, N.E. Washington, DC 20549

> Re: FRP Holdings, Inc. Form 10-K for the year ended December 31, 2022 File No. 001-36769

Ladies and Gentlemen:

On behalf of FRP Holdings, Inc., a Florida corporation (the "*Company*"), we are submitting this supplemental response to our letter dated December 7, 2023, which responds to the letter dated November 28, 2023 from the staff (the "*Staff*") of the U.S. Securities and Exchange Commission (the "*Commission*") regarding the Company's Annual Report on Form 10-K filed on March 3, 2023 (the "*10-K*").

Following our discussion with the Staff, the Company will address the Commission's comments in future filings rather than filing an amendment to the 10-K. Specifically, the Company will refrain from using the term "reserves" in future filings.

If you have any additional questions regarding any of our responses or the Amended 10-K, please do not hesitate to contact Daniel Nunn at (904) 665-3601 or daniel.nunn@nelsonmullins.com.

Very truly yours,

/s/ Daniel B. Nunn, Jr.

Daniel B. Nunn, Jr.

cc: John D. Baker II, Chief Executive Officer, FRP Holdings, Inc. John D. Baker III, Chief Financial Officer, FRP Holdings, Inc. John D. Klopfenstein, Chief Accounting Officer, FRP Holdings, Inc.