



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

Mail Stop 7010

July 14, 2009

John M. Stephens  
Senior Vice President and Chief Financial Officer  
Standard Pacific Corp.  
26 Technology Drive  
Irvine, CA 92618-2338

**Re: Standard Pacific Corp.  
Form 10-K for Fiscal Year Ended December 31, 2008  
File No. 1-10959**

Dear Mr. Stephens:

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

If you have any further questions regarding our review of your filings, please direct them to Bret Johnson, Staff Accountant, at (202) 551-3753 or, in his absence, to the undersigned at (202) 551-3355.

Sincerely,

Terence O'Brien  
Accounting Branch Chief