

Mail Stop 4561

December 19, 2005

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, 2005  
Form 10-Q for Fiscal Quarter Ended March 31, 2005  
Form 10-Q for Fiscal Quarter Ended June 30, 2005  
File No. 1-10466

Dear Mr. Rummell:

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

Sincerely,

Steven Jacobs  
Accounting Branch Chief