

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