



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

DIVISION OF  
CORPORATION FINANCE

Mailstop 3233

January 17, 2017

Via E-mail

Mr. David Distaso  
Chief Financial Officer  
iStar Inc.  
1114 Avenue of the Americas, 39<sup>th</sup> Floor  
New York, NY 10036

**Re: iStar Inc.**  
**Form 10-K for the fiscal year ended December 31, 2015**  
**Filed February 26, 2016**  
**File No. 001-15371**

Dear Mr. Distaso:

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,

/s/ Eric McPhee

Eric McPhee  
Senior Accountant  
Office of Real Estate and  
Commodities