

Mail Stop 4561

May 22, 2007

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, 2006  
Filed February 28, 2007  
File No. 1-10466**

Dear Mr. Rummell:

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

Sincerely,

Kevin Woody  
Accounting Branch Chief