

December 20, 2021

Matthew Partridge
Chief Financial Officer
CTO Realty Growth, Inc.
1140 N. Williamson Blvd.
Suite 140
Daytona Beach, FL 32114

Inc.

Fiscal Year Ended December 31, 2020

Re: CTO Realty Growth,

Form 10-K for the

Filed March 5, 2021

File No. 001-11350

Dear Mr. Partridge:

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