

October 7, 2020

John Albright
Chief Executive Officer
CTO Realty Growth, Inc.
1140 N. Williamson Blvd.
Suite 140
Daytona Beach, FL 32114

Inc.

2020

Re: CTO Realty Growth,

Form S-3
Filed October 1,

File No. 333-249209

Dear Mr. Albright:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Gorman at 202-551-3585 with any questions.

Please contact Stacie

Sincerely,

Division of Corporation Finance

Office of Real Estate & Construction

cc:

Robert B. Robbins, Esq.