

April 13, 2021

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

Inc.

Re: CTO Realty Growth,

Form S-3  
Filed April 1, 2021  
File No. 333-254970

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.

Please contact Stacie Gorman at 202-551-3585 with any questions.

Sincerely,

Division of Corporation Finance

Office of Real Estate & Construction

cc:

Zachary A. Swartz, Esq.