

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

DIVISION OF CORPORATION FINANCE

Mailstop 3010

September 29, 2015

<u>Via E-mail</u> David DiStaso Chief Financial Officer iStar, Inc. 1114 Avenue of the Americas 39th Floor New York, NY 10036

Re: iStar, Inc. Form 10-K Filed March 2, 2015 File No. 0001-15371

Dear Mr. DiStaso:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Robert F. Telewicz, Jr.

Robert F. Telewicz, Jr. Accounting Branch Chief Office of Real Estate and Commodities