Ms. Catherine D. Rice Chief Financial Officer iStar Financial Inc. 1114 Avenue of the Americas New York, NY 10036

Re: iStar Financial Inc.

Form 10-K for the year ended December 31, 2006

File No. 1-15371

Dear Ms. Rice:

We have completed our review of the above referenced filing and have no further comments at this time.

Sincerely,

Kevin Woody Branch Chief