

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

DIVISION OF CORPORATION FINANCE

August 25, 2022

Brett Asnas Chief Financial Officer iStar Inc. 1114 Avenue of the Americas, 39th Floor New York, NY 10036

> Re: iStar Inc. Form 10-K for the fiscal year ended December 31, 2021 Filed February 25, 2022 File No. 001-15371

Dear Brett Asnas:

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