

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

August 20, 2025

Frank V. Saracino Chief Financial Officer BrightSpire Capital, Inc. 590 Madison Avenue, 33rd Floor New York, NY 10022

> Re: BrightSpire Capital, Inc. Form 10-K for the year ended December 31, 2024 File No. 001-38377

Dear Frank V. Saracino:

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