



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3233

December 11, 2017

Via E-mail

Christopher J. Constant  
President and Chief Executive Officer  
Getty Realty Corp.  
Two Jericho Plaza, Suite 110  
Jericho, New York 11753-1681

**Re:   Getty Realty Corp.  
      Registration Statement on Form S-3  
      Filed November 30, 2017  
      File No. 333-221836**

Dear Mr. Constant:

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 Sara von Althann at (202) 551-3207 with any questions.

Sincerely,

/s/ Tom Kluck

Tom Kluck  
Legal Branch Chief  
Office of Real Estate and  
Commodities

cc:   Danion Fielding  
      David Chalk