



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3233

October 24, 2017

Via E-mail

Mr. Ilias Konstantopoulos  
Chief Financial Officer  
Granite Real Estate Investment Trust  
77 King Street West, Suite 4010  
P.O. Box 159  
Toronto-Dominion Centre  
Toronto, Ontario M5K1H1

**Re: Granite Real Estate Investment Trust  
Granite REIT Inc.  
Form 40-F  
Filed March 2, 2017  
File No. 001-35771 and 001-35772**

Dear Mr. Konstantopoulos:

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,

/s/ Jennifer Monick

Jennifer Monick  
Assistant Chief Accountant  
Office of Real Estate and  
Commodities