



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3233

July 11, 2018

Via E-mail

Jay Sugarman  
Chief Executive Officer  
Safety, Income & Growth Inc.  
1114 Avenue of Americas, 39<sup>th</sup> Floor  
New York, New York 10036

**Re: Safety, Income & Growth Inc.  
Registration Statement on Form S-3  
Filed July 2, 2018  
File No. 333-226048**

Dear Mr. Sugarman:

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 me at (202) 551-3391 with any questions.

Sincerely,

/s/ Erin E. Martin

Erin E. Martin  
Legal Branch Chief  
Office of Real Estate and  
Commodities

cc: Kathleen L. Werner, Esq.  
Clifford Chance US LLP