



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

DIVISION OF  
CORPORATION FINANCE

April 1, 2019

Andrew C. Richardson  
Chief Financial Officer  
Safehold Inc.  
1114 Avenue of the Americas  
39th Floor  
New York, NY 10036

**Re: Safety, Income & Growth Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2018**  
**Filed February 14, 2019**  
**File No. 001-38122**

Dear Mr. Richardson:

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 and  
Commodities