

**Alpine Income Property Trust, Inc.**  
1140 N. Williamson Blvd., Suite 140  
Daytona Beach, Florida 32114

November 19, 2019

**VIA EDGAR**

United States Securities and Exchange Commission  
Division of Corporation Finance  
Office of Real Estate and Construction  
100 F Street, N.E.  
Washington, D.C. 20549  
Attention: Pamela Howell

Re: Acceleration Request of Alpine Income Property Trust, Inc.  
Registration Statement on Form S-11 (File No. 333-234304)

Dear Ms. Howell:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Alpine Income Property Trust, Inc., a Maryland corporation (the "Company"), hereby requests that the effective date of the above-referenced Registration Statement be accelerated so that it may become effective at 4:00 p.m., Eastern time, on Thursday, November 21, 2019 or as soon thereafter as practicable.

Once the above-referenced Registration Statement has been declared effective, please orally confirm that event with our counsel, Vinson & Elkins L.L.P., by telephoning David S. Freed at (212) 237-0196.

Thank you for your attention to this matter.

*[Signature page follows]*

Very truly yours,

ALPINE INCOME PROPERTY TRUST, INC.

By: /s/ John P. Albright

Name: John P. Albright

Title: President and Chief Executive Officer

cc: David S. Freed, Vinson & Elkins L.L.P.  
David C. Wright, Hunton Andrews Kurth LLP  
James V. Davidson, Hunton Andrews Kurth LLP