



DIVISION OF  
CORPORATION FINANCE

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

May 5, 2011

Mr. Joel S. Marcus  
Chief Executive Officer  
Alexandria Real Estate Equities, Inc.  
385 East Colorado Boulevard, Suite 299  
Pasadena, CA 91101

**Re: Alexandria Real Estate Equities, Inc.**  
**Form 10-K for the Year Ended December 31, 2010**  
**File No. 1-12993**

Dear Mr. Marcus:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Daniel L. Gordon  
Branch Chief