



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 3233

July 17, 2017

Via E-Mail

Mr. Dean A. Shigenaga
Chief Financial 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 Fiscal Year Ended December 31, 2016
Filed January 31, 2017
File No. 001-12993

Dear Mr. Shigenaga:

We have limited our review of your filing to the financial statements and related disclosures and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comments applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to these comments, we may have additional comments.

Item 7. Management's Discussion and Analysis of Financial Condition and Results of Operations

Operating results, page 64

1. We note your presentation of "Items included in net (loss) income attributable to Alexandria's common stockholders" which appears to be limited to selected items in the statements of operations. With a view towards MD&A disclosure in future filings please tell us the purpose of this presentation and how you determined which items to include and exclude.

Mr. Dean A. Shigenaga
Alexandria Real Estate Equities, Inc.
July 17, 2017
Page 2

Consolidated Statements of Comprehensive Income, page F-4

2. We note the significant “Reclassification adjustments for losses (gains) included in net (loss) income” in 2016. With a view towards MD&A disclosure in future filings, please tell us the reason for the significant fluctuation, the expected impact in future years, how the statement of operations reflects this translation loss and the basis for your accounting.

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.

You may contact Jorge L. Bonilla at (202) 551-3414 or me at (202) 551-3429 with any questions.

Sincerely,

/s/ Kristi Marrone

Kristi Marrone
Staff Accountant
Office of Real Estate and
Commodities