

Mail Stop 4561

July 17, 2008

VIA U.S. MAIL AND FAX 864-239-5824

Stephen B. Waters  
Vice President  
Drexel Burnham Lambert Real Estate Associates II  
55 Beattie Place  
P.O. Box 1089  
Greenville, SC 29602

**Re: Drexel Burnham Lambert Real Estate Associates II  
Form 10-KSB for Fiscal Year Ended  
December 31, 2007  
Filed March 31, 2008  
File No. 002-85829**

Dear Mr. Waters:

We have completed our review of your Form 10-KSB and related filings and do not, at this time, have any further comments.

Sincerely,

Kevin Woody  
Branch Chief