



DIVISION OF  
CORPORATION FINANCE

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

April 27, 2020

Paul Seavey  
Executive Vice President and Chief Financial Officer  
Equity Lifestyle Properties, Inc.  
Two North Riverside Plaza  
Suite 800  
Chicago, IL 60606

**Re: Equity Lifestyle Properties, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2019**  
**Filed February 24, 2020**  
**File No. 001-11718**

Dear Mr. Seavey:

We have reviewed your filing and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this comment 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 comment applies to your facts and circumstances, please tell us why in your response.

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

Form 10-K for the fiscal year ended December 31, 2019

Item 7. Management's Discussion and Analysis of Financial Condition and Results of Operations  
Results of Operations, page 44

1. We note your disclosure of your results of operations. Please tell us what consideration you gave to presenting your discussion of material changes from year to year in a way that corresponds to the line items on your Consolidated Statements of Income or your segment disclosure. Please refer to Item 303 of Regulation S-K and SEC Release No. 33-8350.

Paul Seavey  
Equity Lifestyle Properties, Inc.  
April 27, 2020  
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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 Babette Cooper at 202-551-3396 or Jennifer Monick at 202-551-3295 if you have questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction