



DIVISION OF  
CORPORATION FINANCE

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

September 12, 2019

Thomas E. O'Hern  
Chief Executive Officer  
MACERICH CO  
401 Wilshire Boulevard, Suite 700  
Santa Monica, CA 90401

**Re: MACERICH CO**  
**Form 10-K for the fiscal year ended December 31, 2018**  
**Filed February 25, 2019**  
**Form 10-Q for the quarterly period ended June 30, 2019**  
**Filed August 5, 2019**  
**File No. 001-12504**

Dear Mr. O'Hern:

We have reviewed your filings 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-Q for the quarterly period ended June 30, 2019

Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations  
Funds from Operations ("FFO"), page 42

1. Please tell us how your definition of FFO is consistent with the NAREIT definition of FFO. Specifically, tell us how you have determined it was appropriate to exclude financing expense in connection with Chandler Freehold from your definition of FFO.

In closing, 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 Bonilla, Staff Accountant, at (202) 551-3414 or Jennifer Monick,

Thomas E. O'Hern  
MACERICH CO  
September 12, 2019  
Page 2

Assistant Chief Accountant, at (202) 551-3295 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate and  
Commodities