



DIVISION OF
CORPORATION FINANCE

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

July 12, 2010

Bryce Blair
Chief Executive Officer
Avalonbay Communities, Inc.
Ballston Tower
671 N. Glebe Rd, Suite 800
Arlington, Virginia 22203

Re: Avalonbay Communities, Inc.
Form 10-K for Fiscal Year Ended December 31, 2009
Filed March 1, 2010
Proxy Statement on Schedule 14A
Filed March 31, 2010
File No. 001-12672

Dear Mr. Blair:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Linda VanDoorn
Senior Assistant Chief Accountant