Ms. Jennifer Monick Assistant Chief Accountant Office of Real Estate and Commodities Securities and Exchange Commission 100 F Street, N.E. Washington D.C. 20549

RE: The Macerich Company
Form 10-K for the 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 Ms. Monick:

We are writing in response to your letter dated October 3, 2019, setting forth the additional comment of the staff (the "Staff") of the Securities and Exchange Commission (the "Commission") on the Form 10-Q for the quarterly period ended June 30, 2019 (the "Form 10-Q) of The Macerich Company"). For your convenience, your comment is restated in italics prior to the Company's response to the comment below.

Form 10-Q for the quarterly period ended June 30, 2019

<u>Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations</u>

Funds from Operations ("FFO"), page 42

1. We note your response to comment 1 of our letter dated September 12, 2019. We are unclear how your exclusion of the Chandler Freehold financing expense is consistent with the commonly understood industry definition of FFO. Please revise future filings to retitle the measure or remove the related adjustment.

The Company acknowledges the Staff's comment and will retitle the measure in future filings.

Ms. Jennifer Monick Securities and Exchange Commission October 9, 2019 Page 2

If you have any questions, please feel free to contact me at (310) 394-6000.

Sincerely,

The Macerich Company

/s/ Scott W. Kingsmore

Scott W. Kingsmore
Executive Vice President, Treasurer and Chief Financial
Officer

cc: David Roberts

Goodwin Procter LLP