

**Acadia Realty Trust**  
1311 Mamaroneck Avenue, Suite 260  
White Plains, NY 10605

October 29, 2010

**VIA EDGAR**

U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-3628  
Attn: Michael Pokorny

Re: Acadia Realty Trust  
Form 10-K for the year ended December 31, 2009, filed on March 1, 2010  
Definitive Proxy Statement Schedule 14A, filed on April 9, 2010  
File No. 001-12002

Ladies and Gentlemen,

In connection with responding to comments of the staff of the Division of Corporation Finance of the U.S. Securities and Exchange Commission (the "Commission") relating to the above-referenced filings, Acadia Realty Trust (the "Company") hereby acknowledges that:

- the Company is responsible for the adequacy and accuracy of the disclosure in the filings;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filings; and
- the Company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Please direct any questions with respect to the foregoing to Mark Schonberger of Paul, Hastings, Janofsky & Walker LLP at (212) 318-6859.

Sincerely,

/s/ Michael Nelsen

Michael Nelsen  
Senior Vice President and Chief Financial Officer

cc: Mark Schonberger, Esq., Paul, Hastings, Janofsky & Walker LLP  
Keith D. Pisani, Esq., Paul, Hastings, Janofsky & Walker LLP