



DIVISION OF  
CORPORATION FINANCE

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

October 5, 2023

Justin Hall  
Chief Executive Officer  
NovaBay Pharmaceuticals, Inc.  
2000 Powell Street, Suite 1150  
Emeryville, California 94608

**Re: NovaBay Pharmaceuticals, Inc.**  
**Definitive Proxy Statement on Schedule 14A**  
**Filed May 18, 2023**  
**File No. 001-33678**

Dear Justin Hall:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance  
Disclosure Review Program