



DIVISION OF
CORPORATION FINANCE

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

May 20, 2022

Adrian Adams
Chief Executive Officer
IMPEL PHARMACEUTICALS INC
201 Elliott Avenue West, Suite 260
Seattle, WA 98119

Re: IMPEL PHARMACEUTICALS INC
Registration Statement on Form S-3
Filed May 16, 2022
File No. 333-264987

Dear Mr. Adams:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Margaret Schwartz at 202-551-7153 with any questions.

Sincerely,

Division of Corporation Finance
Office of Life Sciences

cc: Ryan Mittenness, Esq.