



DIVISION OF
CORPORATION FINANCE

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

December 5, 2016

Mail Stop 4720

Via Email

Mr. Shang-yan Chuang
Chief Financial Officer
No. 1687 Changyang Road, Changyang Valley, Building 2
Shanghai 200090, Peoples Republic of China

Re: Noah Holdings Limited
Form 20-F for Fiscal Year Ended December 31, 2015
Filed April 27, 2016
File No. 001-34936

Dear Mr. Shang-yan Chuang:

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,

/s/ Kevin W. Vaughn

Kevin W. Vaughn
Accounting Branch Chief
Office of Financial Services

cc (via email): Alan Seem, Shearman & Sterling LLP