



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4720

October 11, 2017

Via E-mail

Shang Yan Chuang  
Chief Financial Officer  
Noah Holdings Limited  
No. 1687 Changyang Road  
Changyang Valley, Building 2  
Shanghai 200090  
People's Republic of China

**Re: Noah Holdings Limited**  
**Form 20-F for the Fiscal Year Ended December 31, 2016**  
**Filed April 21, 2017**  
**File No. 001-34936**

Dear Mr. 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/ Hugh West

Hugh West  
Accounting Branch Chief  
Office of Financial Services