

January 22, 2021

William Toler  
Chief Executive Officer  
Hydrofarm Holdings Group, Inc.  
2249 South McDowell Boulevard Ext.  
Petaluma, California 94954

Group, Inc.

Statement on Form S-1

19, 2021

Re: Hydrofarm Holdings

Draft Registration

Submitted January

CIK No. 0001695295

Dear Mr. Toler:

This is to advise you  
that we do not intend to review your registration statement.

We request that you publicly file your registration statement no  
later than 48 hours prior  
to the requested effective date and time. 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 Cara

Wirth at (202) 551-7127 with any questions.

Sincerely,

Division of Corporation Finance

Office of Trade & Services

cc:

Kenneth Koch