

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

April 22, 2021

Sterling Griffin Chief Executive Officer Harbor Custom Development, Inc. 11505 Burnham Dr. Suite 301 Gig Harbor, WA 98332

Re: Harbor Custom Development, Inc.

Form S-1 File April 14, 2021 File No. 333-255229

Dear Mr. Griffin:

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 Stacie Gorman at 202-551-3585 with any questions.

Sincerely,

Division of Corporation Finance Office of Real Estate & Construction

cc: Lynne Bolduc, Esq.