



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

Mail Stop 7010

March 9, 2007

By U.S. Mail and Facsimile

Mr. Bruce J. Labovitz  
Chief Financial Officer  
Comstock Homebuilding Companies, Inc.  
11465 Sunset Hills Road  
Suite 510  
Reston, VA 20190

**Re: Comstock Homebuilding Companies, Inc.  
Form 10-K for the Fiscal Year Ended December 31, 2005  
Form 10-Q for the Fiscal Quarter Ended March 31, 2006  
Form 10-Q for the Fiscal Quarter Ended June 30, 2006  
Form 10-Q for the Fiscal Quarter Ended September 30, 2006  
File No. 001-32375**

Dear Mr. Labovitz:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

If you have any further questions regarding our review of your filings, please direct them to Dale Welcome, Staff Accountant, at (202) 551-3865, or, in his absence, to the undersigned at (202) 551-3768.

Sincerely,

John Cash  
Accounting Branch Chief