

November 29, 2005

Mr. Thomas M. Ringo  
Vice President and Chief Financial Officer  
Pope Resources Ltd Partnership  
19245 Tenth Avenue NE  
Poulsbo, WA 98370

Re: Pope Resources Ltd Partnership  
Form 10-K for the Fiscal Year Ended December 31, 2004  
Filed March 9, 2005  
File No. 001-09035

Dear Mr. Ringo:

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

Sincerely,

April Sifford  
Branch Chief

cc: Mr. Ryan Milne