Via US Mail and Facsimile to (509) 526-8873

Lloyd W. Baker Executive Vice President and Chief Financial Officer Banner Corporation 10 South First Avenue Walla Walla, WA 99362

Re: Banner Corporation

Form 10-K for the year ended December 31, 2008

Filed March 16, 2009 File No. 0-26584

Dear Mr. Baker:

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

Sincerely,

Kevin W. Vaughn Branch Chief