

# Property tax as a percentage of residential rent

## Introduction

Since 1975, Minnesota's Property Tax Refund Program has provided income-based property tax refunds to residential homeowners and renters. The refund is based on the relationship between the claimant's property tax and household income. In FY2005, homeowners received \$151 million in property tax refunds. Renters received \$147 million.

Central to the refund calculation is the amount of property taxes paid. For homeowners, this information is provided on the property tax statement. For renters, the information is provided by the landlord.

Prior to 1997, landlords were required by law to apportion the actual amount of the rental property's taxes among individual tenants. A 1997 law replaced this burdensome process with a single statutory assumption about what share of the statewide average rent payment constituted property taxes. At the time, data indicated it to be 18 percent. The next year, that share was changed to 19 percent, where it has remained. However, subsequent property tax law changes now call that figure into question.

The property tax reforms of 2001 resulted in a 24 percent reduction in apartment property taxes for 2002. This suggests that 19 percent is no longer an accurate reflection of taxes paid.

Since the goal of the property tax refund program is to refund a portion of property taxes, it is important to update the assumptions about the property tax share of rental payments. This policy brief reports on recent efforts to provide such an update.

## Analysis

In the absence of readily available statewide data on actual rents and property taxes for individual rental properties, the department used two methodologies

### Summary highlights

The Property Tax Refund Program for renters currently presumes that property taxes on residential rental property represent, on average, 19 percent of annual rent paid. This percentage, applied statewide, affects the size of renter property tax refunds.

However, rental property taxes have fallen significantly since 2001.

This study indicates that the renters' property tax refund program should assume that apartment property taxes as a percentage of rents are 15 percent or less.

Continued use of the 19 percent factor adds a pure rent subsidy to the property tax refund program. While rent subsidies might be justified, they were never an explicit goal of the property tax refund program. Using an assumed percentage of 15 percent or less would restore the refund program's original purpose of refunding rental property taxes.

to measure property taxes as a percentage of rents. First, rental property owners throughout Minnesota were surveyed to collect information on taxes and rents. Second, data collected annually by the U.S. Bureau of Census's American Community Survey was used to compute statewide, regional, and core city estimates. The results were compared to estimates from the Minnesota Housing Finance Agency (MHFA) and the Hennepin County Assessor.

## Findings

The two primary study approaches indicate that property tax as a percentage of residential rent varies by region and property size, but is below 15 percent for most rental properties. Table 1 summarizes results from several methodologies.

**Table 1**  
**Property tax as a percentage of residential rents: recent studies\***

	2004 Dept. of Revenue survey	2003 American Community Survey (U.S. Census)	2003 MHFA data
<b>Statewide</b>	11.7%	12.7%	9.6%
<b>Metro Areas</b>			
Minneapolis	16.9	13.3	11.5
St. Paul	11.3	9.3	13.8
Other 7-county metro	10.4	—	11.2
Other 4-county metro	—	13.3	—
<b>Non-Metro</b>	12.3	11.7	7.3

\* An analysis by Hennepin County found estimated tax as a percent of rent to be 10.4 percent in areas of the county for which the County Assessor provides assessment services.

All approaches to measuring tax as a percentage of rent revealed variations by region, with a somewhat larger portion of rent being attributable to property taxes in core cities than in other cities in the metro-

politan area, and a smaller portion of tax attributable to rent outside the seven-county metropolitan area. These findings are similar to those of studies in 1994 and 1996 reviewed below. In addition, buildings with fewer units tend to have higher taxes relative to rents than do larger buildings.

### Earlier estimates

A formal analysis conducted by the the department's Tax Research Division in 1994 (based on 1992 data) found that actual tax as percentage of rent averaged 16.6 percent statewide, including 17.7 percent in the metro area and 13.3 percent in the non-metro area.<sup>1</sup> While the percentage was much higher for some units, the tax amounted to 20 percent or less of rent for 75 percent of all units statewide (70 percent of metro units and 85 percent of non-metro units).

An informal update based on 1996 data (the last year for which renter refunds were based on actual taxes paid) suggested that the percentage had declined to 14.8 percent statewide, including 15.6 percent of metro area rents and 12.6 percent of non-metro rents. Similarly, the tax share averaged two to three percentage points more for residential non-homestead rents compared to apartment rents. By 2002, extrapolations of these earlier studies suggested that the percentage had declined to approximately 12 percent in the metro area and 13 percent in the non-metro area.

### Current findings

The department looked at several sources of information to determine what share of the typical residential rental payment represents property taxes.

*Survey of property owners:* The department's survey was sent to rental property owners who receive annual certificate-of-rent paid (CRP) instructions. Returned surveys provided tax and usable rent information on about 71,500 rental units statewide. The analysis is based on rents and property taxes paid in 2004.

*American Community Survey (ACS):* The U.S. Census Bureau annually surveys a sample of Minnesota households to estimate various economic and demographic conditions, including estimates of contract rent collected statewide. The ACS data on statewide total rents for 2003 and property taxes paid in 2003 on apartments and residential non-homestead property was used to estimate taxes as a percent of rent paid.

*Minnesota Housing Finance Agency (MHFA):* The MHFA collects annual rental income and property tax information from low-income housing statewide. The most recent data was for 2003, and was adjusted by 25 percent to reflect approximate increases in property taxes due to higher classification rates for low-income housing from 2003 to 2004.

*Hennepin County data:* Based on data from assessment year 2003, taxes payable 2004, the Hennepin County Assessor completed an informal analysis of apartment rents (not including properties with 3 or fewer units). The analysis includes only properties in those areas of Hennepin County for which the county assessor provides assessment services. It excludes properties in Minneapolis and other cities that do their own assessments.

<sup>1</sup> Prior to 1997, renter property tax refunds were based on the actual amount of property taxes paid by the property owner and allocated across all rental units based on a complicated allocation formula. Beginning in 1997, the refund program was changed to base all refunds on a flat percentage of rent, and property owners were no longer required to provide the department with information on actual taxes as percentage of rent.

## Survey of rental property owners

Since there is no single source of information for both rents charged and taxes paid on rental properties, the department surveyed property owners to learn about the relationship between property taxes paid and rents received.<sup>2</sup>

Surveys were mailed to 58,000 property owners, asking them to indicate the number of residential rental units in each property they own, the full rent for all units whether occupied or vacant, and the 2004 property taxes paid on their rental property.

A total of 7,200 usable surveys containing information on approximately 71,500 rental units were returned. The 71,500 units represent 14.2 percent of the estimated universe of all market-rate rental units.

### Survey design

The survey was modeled after the old Landlord Rental Property Tax Form.<sup>3</sup> The form was simplified to make it more understandable, to enhance response rate and to allow for responses to be scanned.

Key changes included:

- The formula for allocating property taxes when a portion of the property is owner-occupied was replaced with a simple check box to allow for a separate analysis of such properties. Owner occupancy affects taxes paid, and can influence rents charged.

- Owners of subsidized properties were instructed to not complete the survey. Unique market and tax circumstances for these properties could skew computations. Data on many of these properties is available from the MHFA.

A copy of the survey cover letter and survey are found at the end of this policy brief.

### Survey distribution

Under the current program, landlords are required to provide tenants with certificates of rent paid (CRPs) using forms and instructions provided by the department. The rental survey was sent to all property owners in the department's CRP mailing database. A small number of these failed to receive the survey (new owners and owners who had moved and did not provide a new mailing address).

Owners of multiple rental properties were instructed to complete the survey for each property they owned.

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2 Information on rents paid is available for current refund filers but not for the overall rental population. Imputing total rents based on reported rents from filers would have been less reliable than self-reported data from property owners. Even if total rents could be imputed, there is no method for matching rents to the property taxes paid, because the department does not collect parcel-level data for apartment buildings.

County assessors typically collect data on total rents for apartment buildings, and have ready access to actual property taxes paid. However, the potential for inconsistencies in this data (given different methods for collection and maintenance), combined with the challenges of drawing a statistically representative sample from across the 87 counties, limited the value of this approach. Further, assessors do not typically collect rent information for properties with less than four units, which are valued based on market sales.

3 Prior to 1997, rental property owners were required to submit these forms, which were expected to provide data that the department could use to verify renter refunds. At that time, renter refunds were computed based on actual property taxes paid by the property owner.

## Data verification

The data from survey respondents was used as reported for completion of this study. A considerable number of responses were initially unusable, including responses that contained incomplete information (rent but no property tax information), and responses with obvious errors (such as providing annual rather than monthly rent).

Survey responses were verified, corrected, or supplemented with information from follow-up telephone calls and e-mails. One common mistake resulted from respondents reporting annual rent amounts rather than rents for September 2004, as instructed. The department adjusted reported monthly rent, based on its general knowledge of market rents statewide, whenever obvious errors could be identified.

For responses with information on rent but not on property tax, that information was determined using

the parcel identification numbers and county codes, if online access to that information was available.

Incomplete records were excluded from the analysis.

## Survey analysis and results

As shown in previous studies, the relationship between property taxes and rent varies by region and by size of property. In general, a larger portion of rent is attributable to property taxes for smaller buildings than for larger buildings, and for buildings with four or more units outside of the metro area relative to those in the metro area.

Overall, the average portion of rent attributable to property taxes was 11.7 percent, excluding properties that were partially owner-occupied.

Averages of property tax as a percentage of rents were weighted to reflect the number of units in a building.

Table 2 summarizes the results.

<b>Building size</b>	<b>Count</b>	<b>Average tax as percent of rent</b>	<b>% with tax under 15%</b>
<b>1 to 3 units</b>			
Minneapolis	1,259	17.6%	56.9%
St. Paul	597	19.2	74.4
Other Metro	2,411	21.1	—
Non-Metro	4,961	16.6	78.1
<b>Statewide</b>	<b>9,228</b>	<b>18.1</b>	<b>72.9</b>
<b>4 or more units</b>			
Minneapolis	4,671	16.8	70.4
St. Paul	3,928	10.1	96.2
Other Metro	31,635	9.6	—
Non-Metro	22,009	11.3	95.3
<b>Statewide</b>	<b>62,243</b>	<b>10.8</b>	<b>93.6</b>
<b>All units (exc. part hmstd.)</b>			
Minneapolis	5,930	16.9	67.5
St. Paul	4,525	11.3	93.3
Other Metro	34,046	10.4	—
Non-Metro	26,970	12.3	92.2
<b>Statewide</b>	<b>71,471</b>	<b>11.7%</b>	<b>90.9%</b>

## American Community Survey estimates

The *American Community Survey* (ACS) is an annual, nationwide household survey administered by the U.S. Census Bureau. It provides information on a variety of economic and demographic characteristics, including residential rents.

Estimates of property tax as a percentage of rent are computed by dividing the sum of apartment and

residential non-homestead property tax, as reported to the department on the 2003 abstracts of tax lists, by the ACS estimate of “contract rent.” Regional estimates are computed to the extent that ACS provides a measure of contract rents for the region. Table 3 summarizes the computations and results.

**Table 3 American Community Survey results for Minnesota**

<b>Statewide</b>	<b>2003</b>	<b>2002</b>	<b>2000</b>
Tax, rental housing			
Residential non-homestead	\$ 168,196,714	\$ 144,569,170	\$ 149,031,976
Apartments	<u>276,528,446</u>	<u>270,372,709</u>	<u>272,738,963</u>
Total tax	444,725,160	414,941,879	421,770,939
Contract rent			
Cash rent paid	3,245,568,540	3,322,342,788	2,840,999,580
Rent asked for vacant units	<u>248,453,868</u>	<u>272,216,808</u>	<u>116,774,016</u>
Total rents	3,494,022,408	3,594,559,596	2,957,773,596
<b>Property tax as % of rent</b>	<b>12.73%</b>	<b>11.54%</b>	<b>14.26%</b>
<b>4-county metro</b>			
Tax, rental housing			
Residential non-homestead	88,916,629	75,587,800	80,840,945
Apartments	<u>212,368,294</u>	<u>205,302,376</u>	<u>203,714,125</u>
Total tax	301,284,923	280,890,176	284,555,070
Contract rent			
Cash rent paid	2,124,907,092	2,201,296,824	1,987,774,884
Rent asked for vacant units	<u>145,957,277</u>	<u>215,413,351</u>	<u>84,443,263</u>
Total rents	2,270,864,369	2,416,710,175	2,072,218,147
<b>Property tax as % of rent</b>	<b>13.27%</b>	<b>11.62%</b>	<b>13.73%</b>
<b>Outstate</b>			
Tax, rental housing			
Residential non-homestead	79,280,085	68,981,370	68,191,031
Apartments	<u>64,160,152</u>	<u>65,070,333</u>	<u>69,024,838</u>
Total tax	143,440,237	134,051,703	137,215,869
Contract rent			
Cash rent paid	1,120,661,448	1,121,045,964	853,224,696
Rent asked for vacant units	<u>102,496,591</u>	<u>56,803,457</u>	<u>32,330,753</u>
Total rents	1,223,158,039	1,177,849,421	885,555,449
<b>Property tax as % of rent</b>	<b>11.73%</b>	<b>11.38%</b>	<b>15.49%</b>
<b>Minneapolis</b>			
Tax, rental housing			
Residential non-homestead	23,072,000	22,242,000	21,949,000
Apartments	<u>58,101,000</u>	<u>58,101,000</u>	<u>47,972,000</u>
Total tax	81,173,000	80,343,000	69,921,000
Contract rent			
Cash rent paid	560,717,400	597,196,488	449,296,932
Rent asked for vacant units	<u>48,564,756</u>	<u>39,094,512</u>	<u>29,935,380</u>
Total rents	609,282,156	636,291,000	479,232,312
<b>Property tax as % of rent</b>	<b>13.32%</b>	<b>12.63%</b>	<b>14.59%</b>
<b>St. Paul</b>			
Tax, rental housing			
Residential non-homestead	9,202,000	7,416,000	8,340,000
Apartments	<u>25,710,000</u>	<u>23,565,000</u>	<u>23,939,000</u>
Total tax	34,912,000	30,981,000	32,279,000
Contract rent			
Cash rent paid	350,722,416	336,340,032	316,630,152
Rent asked for vacant units	<u>23,684,400</u>	<u>36,554,508</u>	<u>19,469,628</u>
Total rents	374,406,816	372,894,540	336,099,780
<b>Property tax as % of rent</b>	<b>9.32%</b>	<b>8.31%</b>	<b>9.60%</b>

ACS estimates are based on sample information collected through telephone, mail, and personal interviews. For 2003, estimates for Minnesota are based on interviews of 8,732 households. Data is published showing upper and lower bounds at a 90 percent confidence interval. The department did not review or evaluate ACS or Census Bureau sampling methodologies.

**Contract rent**, also referred to as ‘rent asked’ for vacant units, is the monthly rent agreed to or contracted for, regardless of any furnishings, utilities, fees, meals, or services that may be included. For vacant units, it is the monthly rent asked for the rental unit at the time of interview.

“Contract rent” includes:

- Condominium fees or cooperative carrying charges, if paid by the renter to the owner.

“Contract rent” excludes:

- Rent for housing units that are occupied without payment of cash rent. Examples: units owned by friends or relatives who allow occupancy without charge; rent-free houses or apartments provided to compensate caretakers, ministers, tenant farmers, sharecroppers, or others.
- Rent for a business unit or for living quarters occupied by another household. Only that part of the rent estimated to be for the respondent’s unit is included.
- Rent for renter-occupied one-family houses on 10 or more acres.

The respondent was to report the rent agreed to or contracted for, even if paid by someone else, such as friends or relatives living elsewhere, a church or welfare agency, or the government through subsidies or vouchers.

## MHFA low-income housing data

Publicly subsidized rental housing makes up a unique segment of the rental housing market. Rent paid by tenants is limited to a set percentage of median household income and, prior to taxes payable in 2004, property tax rates on subsidized rental housing were lower than those for market-based rental property. Nonetheless, because tenants of low-income housing properties participate in the renter property tax refund program, it is useful to evaluate property tax as a percentage of rent for these properties.

The Minnesota Housing Finance Agency (MHFA) collects annual rental income and property tax information from low-income housing statewide. The MHFA provided data on rent income and property taxes for all such properties for 2003, the most recent full year for which data was available.

Two significant adjustments must be made when using data from subsidized rental housing to estimate the general relationship between taxes and rents. First, subsidized rents must be adjusted upwards to approximate market-based rents. Second, property taxes on subsidized rental housing must be increased by 25 percent to reflect the increase in classification rates on subsidized rental housing from 2003 to 2004 (from a class rate of 1 percent to a rate of 1.25 percent).

Adjusting the data provided by MHFA, the department computed a weighted average<sup>4</sup> of property tax as a percentage of rent for 14,564 low-income housing units. Table 4 summarizes the results of the analysis.

<b>Location</b>	<b>Units</b>	<b>Tax as % of rent</b>	<b>Adjusted tax as % of rent</b>
Minneapolis	1,948	9.2%	11.5%
St. Paul	1,460	11.2	13.8
Other Metro	4,066	9.0	11.2
Non-Metro	7,090	5.8	7.3
<b>Statewide</b>	<b>14,564</b>	<b>7.7%</b>	<b>9.6%</b>

<sup>4</sup> The effect of the 'weighting' mechanism is to treat individual units in a 200-unit building as one data point, rather than using the average for the whole.

## Hennepin County analysis

At the department's request, the Hennepin County Assessor completed an analysis of property tax as a percentage of rent for all apartment properties in areas of the county for which the County Assessor provides assessment services. The analysis is based on property taxes payable and estimates of full rents for 2004.

The assessor compared estimated full rents to the taxes paid on each property for taxes payable 2004 to compute tax as a percentage of annual rent. Estimates of full rent for individual properties (i.e., full occupancy at full market rent levels) was derived from information voluntarily provided by property owners and from assessment staff estimates based on the rental market and the number and mix of rental units.

Table 5 summarizes the number of properties and units in the analysis.

The assessor determined that properties with tax as percent of rent greater than 30 percent were anomalies and excluded them from the analysis.

Data on estimated full rents provided to assessors is confidential. Only the results of the analysis were used.

Finally, residential rental properties of less than four units—such as non-homesteaded single family homes, duplexes, and triplexes—are not included in the analysis because the assessor does not have information on rents for those types of properties, the value of which is based on market sales rather than the income potential of the property.

<b>Category (# of units)</b>	<b># of properties</b>	<b># of units</b>	<b>Properties excluded</b>	<b>Tax as % of rent</b>
4 – 6 units	108	455	6	13.1%
7 – 39 units	290	4,534	2	10.6
40 or more units	124	12,343	0	10.3
<b>Total</b>	<b>522</b>	<b>17,332</b>	<b>8</b>	<b>10.4%</b>

# MINNESOTA • REVENUE

December 8, 2004

Dear Property Owner/Manager:

The Minnesota Department of Revenue is conducting a one-time survey to evaluate the relationship between residential rents and property taxes, and we need your help.

Please complete the enclosed Rental Property Survey for each of the residential rental properties you own or manage. Your answers will help us estimate the current percentage of rent that goes to pay property taxes.

The survey was developed in consultation with the Minnesota Multi-Housing Association, a statewide trade organization for the multi-housing industry. The association encourages completion of the survey.

The information you give us will be kept confidential; nothing you tell us will be used in any manner that would identify the address or ownership of a property.

**For owners of more than 10 properties:** The enclosed survey is the preferred response format. However, because it is important that we collect information from all properties in the state, we will also accept Microsoft Excel (or compatible) spreadsheet files submitted by e-mail (see instructions on the back of the survey form).

A postage-paid envelope is enclosed for returning the survey. Please return completed surveys by **January 14, 2005**. Responses should be mailed to:

Minnesota Revenue  
Mail Station 7100 – Property Survey  
St. Paul, MN 55146-7100

For more information or for questions regarding completion of the survey, please call 651-556-3050. TTY users, call 711 for Minnesota Relay.

Thank you for your assistance.

Minnesota Department of Revenue

Minnesota Revenue  
600 North Robert Street  
St. Paul, MN 55101

*An equal opportunity employer*

# Rental Property Survey

Complete the information below for each rental property you own or manage.  
 The data you provide will be used for informational purposes only.

**Survey #**

**Do not enter dashes, letters, commas or dollar signs. Round dollar amounts.**

	Property ID or parcel number <small>(do not enter dashes, periods or letters)</small>	County code <small>(see instructions)</small>	Total residential units on property	Total scheduled rents for Sept. 2004 <small>(see instructions)</small>	2004 property taxes for residential rental portion of property <small>(see instructions)</small>
<input type="checkbox"/> <b>Property 1</b> <small>Check if any portion is homesteaded</small>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> <b>Property 2</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> <b>Property 3</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> <b>Property 4</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> <b>Property 5</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> <b>Property 6</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> <b>Property 7</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> <b>Property 8</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> <b>Property 9</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> <b>Property 10</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Thank you for completing this survey.

Please return it in the postage-paid envelope provided by **Jan. 14, 2005.**

# Rental Property Survey Instructions

This survey will be used to estimate the current percentage of rent that goes to pay property taxes. It will not be used for any tax purposes. **Please return it in the postage-paid envelope by Jan. 14, 2005.**

**Do not complete this survey** for subsidized properties.

**Complete this survey** for each residential rental property you own or manage in Minnesota. Owners include individuals, partnerships and corporations. Rental property includes apartment buildings, duplexes, triplexes and single-family homes that are rented to others for residential use.

**Note:** If you own an apartment complex and receive only one property tax statement for the complex, consider the apartment complex one property.

## Completing the survey

**If you have more than 10 properties**, please make copies of the blank survey so you can report information for all properties.

**Using an Excel spreadsheet to report data.** If you prefer, you may use a spreadsheet to report the information instead of using the original survey form. Information on the spreadsheet must be in the same order as requested on the survey and must include the survey number (located in the upper right-hand portion of the survey form).

We accept Microsoft Excel (or compatible) spreadsheet files submitted by e-mail to:

[property.survey@state.mn.us](mailto:property.survey@state.mn.us)

## Instructions

### Homestead checkbox

If any portion of the property has homestead status, check the box in front of the parcel ID number for that property.

### Parcel ID number

Enter the parcel ID number from your property tax statement. Do not enter any dashes, periods or letters.

### County code

Using the chart below, enter the three-digit code for the county in which the property is located. **Note:** If the property is located in Minneapolis or St. Paul, use the city code indicated instead of the Hennepin or Ramsey county codes.

### Number of units in property

Enter the total residential units within the property.

### Total scheduled rents for September 2004

To the extent practical, include the following:

- The full rent for all units whether occupied or vacant. If vacant, use either the rent paid for the unit immediately before it was taken off the market, or the rent you would have received if you had rented the unit in the same condition as other units in the building.
- The full rent you would normally charge for a unit given to a caretaker or resident manager free of charge or at a reduced rent.

- The value of free or reduced rent given to tenants either as an incentive to rent or for providing other services.
- Amounts paid to you for rent on behalf of any renter by a government agency.
- Amounts paid to you for the use of a garage and/or parking space.

Do not include:

- Damage deposits,
- Rent paid to you in September 2004 for months other than September 2004, or
- Charges for medical services, food or laundry.

### 2004 property taxes for rental portion

Enter the tax from line 6 of the 2004 column of the Statement of Property Taxes Payable in 2004. Do not include special assessments.

## Mailing address

Use the enclosed postage-paid envelope or mail to:

Minnesota Revenue  
Mail Station 7100 – Property Survey  
St. Paul, MN 55146-7100

## If you have questions

Call 651-556-3050. TTY users, call 711 for Minnesota Relay.

## Minnesota County Codes

Aitkin ..... 001	Dakota ..... 037	Kittson ..... 069	Nicollet ..... 103	St. Louis ..... 137
Anoka ..... 003	Dodge ..... 039	Koochiching ..... 071	Nobles ..... 105	Scott ..... 139
Becker ..... 005	Douglas ..... 041	Lac qui Parle ..... 073	Norman ..... 107	Sherburne ..... 141
Beltrami ..... 007	Faribault ..... 043	Lake ..... 075	Olmsted ..... 109	Sibley ..... 143
Benton ..... 009	Fillmore ..... 045	Lake of the Woods ..... 077	Otter Tail ..... 111	Stearns ..... 145
Big Stone ..... 011	Freeborn ..... 047	LeSueur ..... 079	Pennington ..... 113	Steele ..... 147
Blue Earth ..... 013	Goodhue ..... 049	Lincoln ..... 081	Pine ..... 115	Stevens ..... 149
Brown ..... 015	Grant ..... 051	Lyon ..... 083	Pipestone ..... 117	Swift ..... 151
Carlton ..... 017	Hennepin ..... 053	McLeod ..... 085	Polk ..... 119	Todd ..... 153
Carver ..... 019	If Mpls., enter ..... 175	Mahnomen ..... 087	Pope ..... 121	Traverse ..... 155
Cass ..... 021	Houston ..... 055	Marshall ..... 089	Ramsey ..... 123	Wabasha ..... 157
Chippewa ..... 023	Hubbard ..... 057	Martin ..... 091	If St. Paul, enter .. 177	Wadena ..... 159
Chisago ..... 025	Isanti ..... 059	Meeker ..... 093	Red Lake ..... 125	Waseca ..... 161
Clay ..... 027	Itasca ..... 061	Mille Lacs ..... 095	Redwood ..... 127	Washington ..... 163
Clearwater ..... 029	Jackson ..... 063	Morrison ..... 097	Renville ..... 129	Watonwan ..... 165
Cook ..... 031	Kanabec ..... 065	Mower ..... 099	Rice ..... 131	Wilken ..... 167
Cottonwood ..... 033	Kandiyohi ..... 067	Murray ..... 101	Rock ..... 133	Winona ..... 169
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