

October 13, 2025

Ms. Christine Boulware  
Historic Preservation Specialist  
Planning and Economic Development  
25 4<sup>th</sup> Street West, Suite 1400  
Saint Paul, MN 55102

RE: Local designation of the Theodore Hamm Brewing Company Heritage Preservation District,  
SHPO Referral Number 2025-1761

Dear Ms. Boulware,

Thank you for the opportunity to comment on the above referenced designation. It has been reviewed pursuant to Minnesota Statute §471.193, subd. 6., and 73.05 (c) of Saint Paul's Legislative Code.

The Theodore Hamm Brewing Company Heritage Preservation District encompasses roughly 23 acres of land on the edge of mixed industrial and residential neighborhoods in the Dayton's Bluff, Railroad Island, and Payne Phalen districts, northeast of downtown Saint Paul. The historic district is contiguous and cohesive in terms of the proximity of the buildings and their relationships to each other. There are 32 historic buildings and/or structures within the district boundaries, 21 of which are contributing. The integrity of the district is reinforced by the predominant use of brick in construction of the buildings as well as the deliberate repetition of details visually linking the one-to-six story buildings and associated pump houses, tunnels, silo, shavings vault, retaining wall and bridge.

The Theodore Hamm Brewing Company Historic District is significant under Criterion 1 of Saint Paul's Preservation Ordinance as one of the most important breweries to operate in the state of Minnesota. It is also significant under Criterion 3 for its association with three of the state's more influential businessmen, and under Criterion 7 for its unique location or singular physical characteristic representing an established and familiar visual feature of a Saint Paul's Eastside neighborhood. By applying the latest scientific and technological innovations to improve and expand its plant and operations, the Hamm Brewery became a leader in the brewing industry, locally and regionally, attaining statewide industrial significance from 1865 to 1952. Both the company and its founder, Theodore Hamm, his son William and grandson William, Jr., influenced development in Saint Paul and the Twin Cities area.

The Theodore Hamm Brewing Company Historic District was officially determined eligible for listing in the National Register in 2005. An updated nomination, again seeking a determination of eligibility from the National Park Service (NPS) due to owner objection, was submitted to the NPS in January 2025. The submission supported the 1865-1952 period of significance and boundary currently defined in the local designation study. However, NPS National Register staff returned the documentation requesting that the “proposed boundary be redrawn to exclude resource #49 entirely” due to lack of integrity. NPS also noted that the nomination “supports extending the period of significance to end in 1965 instead of 1952” and asked that the period of significance be revised. We anticipate successful National Register listing will require both changes to be made.

We concur that the district is a good candidate for local designation.

If you have any questions regarding our assessment of these properties, please contact me at 651.201.3291 or [michael.koop@state.mn.us](mailto:michael.koop@state.mn.us).

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Koop", is positioned below the word "Sincerely,".

Michael Koop  
State Historic Preservation Office

cc: Ginny Way, National Register Architectural Historian