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HISTORIC PRESERVATION IN TURKEY AND THE UNITED STATES:  
A CROSS-CULTURAL COMPARISON

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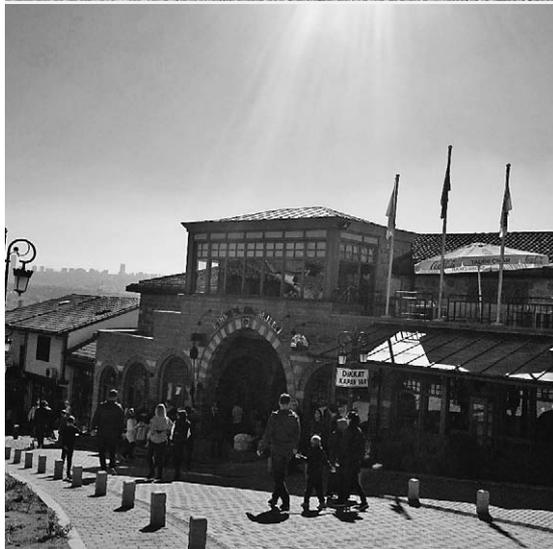


FIG. 1 EXAMPLES OF WAQF BUILDINGS RENOVATED BY THE KOÇ FOUNDATION:

- SAFRAN HAN (TOP LEFT AND RIGHT): REFUNCTIONED AS A MUSEUM IN 2016
- ÇUKUR HAN (IN THE MIDDLE): REDONE TO BE USED AS A HOTEL IN 2010
- ÇENGE L HAN (BOTTOM LEFT AND RIGHT): REFUNCTIONED AS A MUSEUM IN 2005

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# HISTORIC PRESERVATION IN TURKEY AND THE UNITED STATES: A CROSS-CULTURAL COMPARISON

CROSS-CULTURAL COMPARISON  
HISTORIC PRESERVATION  
NON-GOVERNMENTAL ORGANIZATIONS  
THE UNITED STATES  
TURKEY

The research examines and compares the various roles of governmental and non-governmental organizations (NGOs) in Turkey and the United States, aiming to assess how they shaped the preservation field and their potential knowledge transfer values. The study was conducted in governmental archives, official websites of related organizations and through oral communication and literature surveys related to preservation foundations, NGOs, and waqfs in both countries – with different national, historic, religious, and cultural characteristics. The parameters used as cross-cultural comparison included

primary actors and main legislations in preservation both in history and at present. The research has revealed that the waqf system in Turkey has a deep-rooted historic, religious, and socio-cultural context, and differs from the preservation foundations in the USA in many respects. Yet, the foundations established in and after the 20<sup>th</sup> century in Turkey and the preservation activities of foundations in both countries also share similar motives, stimuli, and objectives to preserve both natural/cultural heritage and cross-cultural comparisons suggest that they may learn from each other by knowledge transfer.

## INTRODUCTION

Cultural heritage is an important part of society's social, cultural, and economic well-being. Governmental institutions and the countries' private sector work together in the architectural preservation of the built heritage and in doing so, both national and international legislation, standards, and guidelines are applied. Existing approaches to architectural conservation mostly tend to seek an answer to "how" and "why" preserve (Ahunbay, 2004: 8; Kuban, 2000: 54, 58; Madran and Özgönül, 2005: 57; Tümer, 1997: 19-21; Zakar and Eyüpgiller, 2015; Page, 2016: 19-67; Wagner and Patterson-Tiller, 2018; Tomlan, 2015; Meeks and Murphy, 2016). However, to better understand the answers to these questions, it is also important to question the main actors in historic preservation and to ask the question of "who". Hence, in this study "how" and "why" to preserve is discussed shortly and due to the lack of literature on the efforts of preservation actors, it is aimed at examining the role of state institutions and private foundations, waqf<sup>1</sup>, and civil society organizations in historic preservation in the context of two different countries. Thus, the question of "who" is equally important and is in the focus of the paper.

Turkey and the United States, which have rather different legislations, organizations, and even terminologies in the preservation field, have been chosen as the case study countries. There is a limited number of stud-

ies on the cross-cultural comparison of heritage preservation in the United States, Britain, Europe, and Asia (Barthel, 1989: 87-105; Fung et al., 2017: 927-942; Keune, 2003: 353-382; Ornelas et al., 2016: 725-732; Quintard-Morenas, 2004: 137-190; Stubbs and Makás, 2011; Xu, 2017; Yang, 2014; Wang, 2007; Yeomans, 1994: 159-178). There are also quite a few studies on the preservation of built heritage by foundations and the waqf system in both Turkey (Akar, 2009; Dede-hayır, 2010; Keskin, 2015; Madran, 1996, 1997, 2004; Öztürk, 2007; Şahin and Güner, 2006) and the USA (Howe, 2003; Merrill, 1980; Mulloy, 1976; Murtagh, 1997; Wood, 2010). The studies focus on the preservation activities in each country, and thus lack a comparative context. However, cross-national and cross-local comparisons can be useful for transferring knowledge for contemporary studies (Alterman, 2010). In the same way, such a comparison is essential to understand the role of NGOs, state and community involvement, conservation mechanisms, and to reveal advantages and disadvantages in architectural preservation in both countries. That way both heritage regulation makers and heritage users of each country may learn from each other by transferring their strengths and/or re-arranging the weaknesses. The main arguments in favour of such a comparison of these two cases are presented below:

- Despite the very differences in each country, there are also links and relationships in the preservation field/policies, and the preservation legislation in each country plays a similar role and functions to resolve problems/dilemmas in historic preservation practices. Therefore, by revealing links and comparing preservation practices and policies, practitioners in the preservation field might have the opportunity to exchange knowledge about alternative approaches to preservation and could benefit from a comparative experience in order to enhance the sustainability of built heritage.
- Cross-cultural comparisons of two different countries with two long-established systems (waqf versus NGOs), should also enable legislators and practitioners (in both the public and private sector) to gain knowledge about an alternative legal framework, actors' participations/engagements, and their main stimulus/motivations in the heritage preservation, making it possible to come up with better solutions, face challenges, and avoid past failures.
- Last but not least, such a comparison reflects various public, national, social, and cultural conditions of each country, making systematic mutual learning/development and sustainable management of heritage preservation a possibility in case they are well-analysed.

## METHODOLOGY OF THE RESEARCH

The research method included literature survey, historic and archival research and cross-cultural comparisons in Turkey and the USA. Archives of the Directorate General of Foundations (DGF) Department of Culture and Registration in Turkey was applied for the waqf deeds of the monuments and for their translations in order to gain knowledge about the terms and conditions of waqf documents. Waqf documents on Sultan Suleyman Khan Waqf, Nurbanu Valide Sultan Waqf, Sultan Keykavus Waqf, and Bursa Yıldırım Bayezid Waqf were examined in detail. In addition, the Foundation Services Department was applied and the experts in the department were interviewed for the data on new and old foundations to specify the ones related to the preservation field. The author also experienced the Cultural Heritage Conservation Board meetings in Ankara and Karabük in 2005-2008 as the institution representative member of the Ankara Regional Foundation Directorate Office. In the USA, similarly, the author attended the Minnesota State Review Board meeting in late 2012 as a guest participant. That way it became possible to interview Conservation Board members and gain experience about Conservation Board meetings in both countries, as well as about various conversations, decisions, and perspectives on historic preservation in both Turkey and the USA. Data on registered historic properties in both countries has been provided from the official websites of the Ministry of Culture and Tourism in Turkey (MoCT, 2022a) and the National Register Database and Research in the USA (NRDR, 2022). Similarly, primary legislation, by-laws, resolutions, organizations, standards, guidelines, and higher education programs on historic preservation were provided from the official websites of related institutions (National Park Service-NPS, Ministry of Culture and Tourism-MoCT, T.R. Presidency Legislation Database System-PLDS, Council of Higher Education-CHE, Preservation Directory) in both countries (Council of Higher Education-CHE, 2022; NPS, 2018a; NPS, 2018b; NPS, 2021a; NPS, 2021b; Preservation Directory, 2022; MoCT, 2022b; PLDS, 2022).

The research covers the development of historic preservation, various preservation legislation, and organizations in both countries,

a clarification of the roots and history of different NGOs, foundation/waqf systems, and their role in preservation activities and the questions of “how” and “why” to preserve in each country. What follows is a cross-cultural comparison in the preservation field held by foundations, revealing their similarities and differences, as well as potential advantages and disadvantages, in order to develop a transfer of values.

Turkey and the USA have been chosen as the case study regions for cross-cultural studies first, because they have different historic backgrounds and legal frameworks on the field and, second, have different cultural, social, national, religious, economic, geographical, landscape, and climate characteristics, which all shape preservation activities. Their total area and population density also differ. Regarding the governmental, institutional authorities, and civil society working within the preservation field, the two countries have highly different organizational frameworks and historic roots (waqf versus NGOs). Regarding the similarities, both have abundant and diverse heritage properties similar in number, of international significance, national, or local importance, which are under legal protection.<sup>2</sup>

This increases tourism potential related to built cultural heritage and presents a pool of similar challenges and opportunities in terms of preservation and urban development. In addition, both countries have their own preservation legislations, as well as adopted international preservation charters and conventions, dedicated to the enhancement of heritage preservation. Similarly, they both have a dynamic history hosting various identities, which influence the management, function, and owners of heritage buildings/areas, and both of them were also influenced by their neighbours or multi-ethnic societies throughout history. Despite their different sizes, culture, and economy, public participation can be observed in preservation practices, affecting the cultural heritage management and development in both countries. There is also community involvement and public-private partnership in both Turkey and the USA, which has been beneficial for the preservation of different types and scales of cultural heritage. Lastly, in both countries, a master's program in historic preservation started in the same years, proving the increased level of consciousness and emphasis on the scientific importance of the preservation field.

Differences and similarities attract the attention of a deeper study which should reveal the very reasons and transfer potentials for the betterment of preservation studies in both countries.

<sup>1</sup> Waqf means “to prohibit the selling or buying of an immovable and donate it for the use and welfare of the public” (Madran, 2004: 143).

<sup>2</sup> Since 1966, more than 95,000 historic properties (in total 96,643 buildings, structures, districts, and sites) have been registered and listed in the National Register of the USA (NRDR, 2022), and the number of registered historic properties in Turkey has reached to 119,263 by the end of 2021 (MoCT, 2022a).

## PRESERVATION IN TURKEY

In Turkey, until the mid-19<sup>th</sup> century, Islamic provisions and the waqf system, first started in the Seljuk period and continued up till the end of the Ottoman period, provided the most effective regulatory system in the field of conservation. Regarding the questions of “why” and “how” to preserve; waqf institutions were based on charitable giving, serving God forever, and concepts of alms and offerings of the Koran, establishing many buildings or complexes such as mosques, madrasahs, baths, imarets, and hospitals<sup>3</sup> (Akar, 2021: 87-104). The philanthropic people, who established the waqf institution, also donated an income-generating property to this institution and ensured that the services, including repairs and maintenance works, were provided uninterruptedly in the institution. Waqfs include a written endowment deed to formalize all the donated goods and incomes and include information on their status, how the income was collected, and where and how it would be spent. It was in 1839 with the Tanzimat period that the institutionalization of the waqf system and legal regulations in repairs started (Madran, 2002: 14-15; Madran, 1996: 60; Dişli and Günel, 2020). Ebniye Regulations (1848), Municipal Provisions of Şehremenati (1855), and Turuk and Ebniye Charter (1864) all included indirect regulations on the repairs of cultural heritage, but it was in 1869 that the first legal regulation on the protection of cultural heritage (Asar-ı Atika) was adopted. In 1874, 1884, and 1906 the second, third, and fourth Ancient Monument Regulations were adopted, respectively. The Conservation of Monuments Act was adopted in 1912 for the protection of monuments from demolition that requires authorization, and in 1923 the Turkish Republic was established, so all the remains belonging to earlier cultures were accepted as the common heritage (Jokilehto, 2011: 245). In 1917, a conservation council, mostly responsible for the registry of monuments throughout Istanbul, was established and later, with a new regulation in 1924, renamed the Committee for the Protection of Old Monuments, making it compulsory for both the state and individual actors to take permissions from this new commission for any restoration interventions (Açıkgöz, 2014). In 1933, a new Commission, responsible for the conservation of monuments in the whole country, was established and giving impetus to national listing and documentation. In the Early Republican period (1923-1950), the restoration of monuments in Istanbul went through coordination problems and inter-institutional conflicts. There was also an intense restoration program, in most cases extending the building itself and causing the

destruction of adjacent structures for the sake of increased visibility and modernization via urban transformation projects (Açıkgöz, 2014; Dinler, 2021). Açıkgöz (2014) interprets this situation as a kind of appropriation, either in the form of refunctioning of old monuments or ‘stylistic, periodic, and dynastic classification’ of heritage buildings all discursively aimed at emphasizing the national label, Turkish patrimony. He further argues that in the Early Republican period, historic preservation was an effective way to exhibit the nascent power of the nation-state and to increase its authority on society, while their diplomatic significance, national prestige, construction period, and patrons of the monuments were the primary factors affecting preservation decisions (Açıkgöz, 2014).

With the establishment of the first expert agency, the High Council (HC) for the Historic Real Estate and Monuments in 1951, new discussions on conservation began, such as conservation of historic areas as well as individual buildings, and HC operated as the scientific body of the centralized authority (Şahin-Güçhan and Kurul, 2009: 22, 26, 28; Dinler, 2021). Later, Antiquities Law No 1710 was accepted in 1973, which introduced the term ‘conservation site’ for the first time as part of “integrated conservation” (Dinler, 2021). The HC continued its duties until the adoption of the Law of 2863 on Conservation of Cultural and Natural Property in 1983. With the amendment of this Law, in 2004, some major changes were observable both in institutional and regulatory areas in preservation works. Thus, new responsibilities were given to the local governments, resulting in the increasing localization of the conservation activities (Table I). In addition, according to Aykaç (2021) with the establishment of the Turkish Cooperation and Coordination Agency (TİKA) in 1992, the Neo-Ottomanism policy, first emerged in Turkey in the 1980s, accentuated the political, cultural, and economic influence of Turkey, including heritage conservation activities, in the regions where Ottoman Empire was dominated once over, and in early 2000, this policy was more strongly acknowledged. She further argues

<sup>3</sup> As an example, most important building complexes in Anatolia such as the Suleymaniye Mosque Complex, Atik Valide Mosque Complex in Istanbul, Sivas İzzettin Keykavus Hospital, and Bursa Yıldırım Bayezid Mosque Complex were all constructed through the charitable giving of waqfs established by the sultans or important people. For more details, see their waqf deeds: Archives of Directorate General of Foundations (case no: 135, new classification no: 52, general 1390) undated foundation deed belonging to the “Sultan Suleyman Khan Waqf”; Archives of Directorate General of Foundations, in Notebook No. 1426 and 2113, Sultan II. Selim Khan’s wife Nurbanu Valide Sultan (Atik Valide Sultan) Waqf in Arabic, dated 990 H. (1582 M.); Arabic waqf deed belonging to the Sultan Keykavus Waqf dated 618 H. registered in the Archives of Directorate

TABLE I PRIMARY REGULATIONS AND ORGANIZATIONS RELATED TO HISTORIC PRESERVATION IN TURKEY

1.	Establishment of Old Armoury and Artefacts Collection Museum	1846	14.	Establishment of Turkish Monuments (Asar-ı Atika) Directorate affiliated to the Ministry of Education	1920
2.	Ebniye Regulations	1848	15.	Acceptance of Turkish Civil Code numbered 743	1926
3.	Establishment of Şehremenati (Municipality)	1855	16.	Law of Municipalities	1930
4.	Turuk and Ebniye Charter	1864	17.	Municipal Buildings and Roads Law	1933
5.	First Ancient Monument Regulations	1869	18.	Establishment of Commission for Conservation of Monuments (Asar-ı Atika Komisyonu)	1933
6.	Second Ancient Monument Regulations	1874	19.	The Law of Reorganization of DGF	1938
7.	Regulations for the Construction and Repair of State-Owned Buildings	1877	20.	Establishment of regional departments of General Directorate of Historic Artefacts and Museums (GDHAM)	1944
8.	Ebniye Law	1882	21.	Establishment of The High Council for Historic Real Estate and Monuments	1951
9.	Third Ancient Monument Regulations	1884	22.	Antiquities Law No 1710	1973
10.	Fourth Ancient Monument Regulations	1906	23.	Law on Conservation of Cultural and Natural Property, Act of 2863	1983
11.	Conservation of Monuments Act	1912	24.	Establishment of Ministry of Culture	1989
12.	Ancient City Walls and Castles to be left to the municipalities and the governor's officers Act of 578	1915	25.	Law of 5226, Amendment of Law of 2863	2004
13.	Establishment of the Permanent Organization of the Conservation Council of Ancient Monuments (Muhafaza-ı Asar-ı Atika Encümeni Daimisi)	1917			

that TİKA was involved in the conservation of Ottoman heritage in Central Asia, the Balkans Peninsula, the Middle East, and North Africa by using multiple neo-Ottomanism policies as a convenient tool for constructing Turkey's transnational heritage-making (Aykaç, 2021).

#### – The role of foundations in historic preservation in Turkey: history and development

– In Turkey, non-governmental organizations (NGOs) have been active in the conservation field since the Ottoman period. The waqf system<sup>4</sup> of that period already demonstrated civil society solidarity, working for the sake of the public, including maintenance activities without any incentive, such that in the 19<sup>th</sup> century, nearly 7% of the waqf income was allocated for the repair needs and expenses of the buildings. Under the conditions specified in the waqf deeds, the trustees conducted repairs for the most part before the Tanzimat period (before the mid-19<sup>th</sup> century). Only when the income of the foundation was insufficient for repair, did the state treasury intervene. In addition, among the employees of the large foundations were there permanent workers, called *'meremmetci'* responsible for regular maintenance and repair works (Madran, 2002: 9). Similarly, in the 19<sup>th</sup> century, the first non-governmental organiza-

tions on conservation and museology were first established. The Izmir Library and Museum Society (founded before 1878) is known as the first NGO in the conservation field in the late Ottoman period, requesting excavation and research permits from the governorship (Madran, 2002: 79). The Art Friends Society, founded by Osman Hamdi Bey, and the Turkish Association (1909) contributed indirectly to conservation studies through financial support or educational activities. The Assembly of Ottoman Engineers and Architects (1908), Assembly of Istanbul Advocate (1911), Izmir Assembly of Advocates of Ancient Monuments (1927), Turkish Touring and Automobile Association (TURING, 1923), Edirne Regional Association of Advocates of Ancient Monuments (1935), Association for the Conservation and Repair of Monuments in Turkey (ACRM; 1946), and Bursa Assembly of Advocates of Ancient Monuments (1946) were among other conservation organizations in Turkey in the early 20<sup>th</sup> century (Keskin, 2015: 27-33, 45; Madran, 2002: 80; Madran, 1997: 83-84; Şahin-Güçhan and Kurul, 2009: 38). Before the Republican Period (1923), the number of NGOs was rather small, but after the 1990s they increased rapidly, including the Society of Conservation and Restoration Specialists (KORDER, 1998), Foundation of Ankaraites (1999), and Foundation of Beypazarı Culture and Solidarity Society (after 1999; Şahin-Güçhan and Kurul, 2009: 38). The Union of Chambers of Architects and Engineers of Turkey (1954), Association for Conservation of Historic Houses (1976), TAÇ Foundation (1976), and ÇEKÜL Foundation (1990) were among the important NGOs originally established or with conservation activities before the 1990s. The Koç Foundation<sup>5</sup> (1969) and Sabancı Foundation (1974) also work in the field of restoration, though they were originally established for educational

General of Foundations, on page 288 and 138 of the book numbered 584; Bursa İmaret foundation of Yıldırım Bayezid Waqf dated 802 Ramadan / May 1400, Archives of Directorate General of Foundations, Müceddet Anadolu notebooks of 79 and 205, registered on page 45.

<sup>4</sup> Waqfs were originally intended for socioeconomic welfare of poor and disadvantaged. But this system was rather different from the patriotically motivated first examples of historic preservation in the US.

<sup>5</sup> As an example, Çengel Han, Çukur Han, and Safran Han were among the most important waqf buildings constructed in the 16<sup>th</sup> century in the historic city center of Ankara, and were all renovated with the financial support of the Koç Foundation in 2003-2016 under the inspection of Directorate General of Foundations.

purposes (Öztürk, 2007: 74-83; Fig. 1). Historical Cities Association (HCA; 2000), on the other hand, was the pioneer of a new understanding of civilization, localization, and mass movement in conservation activities by connecting the public with municipalities. That is why HCA is a good example of public-private partnership in preservation practices in Turkey, by promoting community integration, creating job opportunities, and enhancing heritage tourism and education activities. The Middle East Technical University (METU) was the first university in Turkey with its restoration graduate program established in 1964. At present, the Chamber of Architects of Turkey, private property owners, associations, societies, and universities are the main private actors in historic preservation.

– **General tendencies and institutional development in historic preservation in Turkey**

– In the pre-1839 period, it was important to protect the ‘economic and functional values’ of mostly religious buildings through the waqf system (Akar, 2009; Dişli, 2013: 31-32; Madran, 2004: 140-144, Şahin-Güçhan and Kurul, 2009: 21-22). Especially in the Classical Ottoman period, religion was a very important factor for the conservation of waqf buildings, and the waqf institution provided continuous maintenance, and repair works of cultural properties, enabling a mitigation of the effects of natural disasters, threats, and risks in order to ensure their survival without the need for comprehensive repairs. Yet, this value-based protection approach, unawareness, religious conservatism, and financial obstacles, also caused a decay of heritage buildings (Madran, 2004: 37, 140-141). In the late Ottoman period, the first regulations mostly focused on archaeological works, excavations, and movable heritage/artifacts. In the Act of 1884, conservation was limited to properties belonging to the pre-Ottoman period, and only in 1906, did the term ‘historic artifact’ start to include the ones belonging to Turkish-Islamic and non-Islamic periods (Dişli and Günel, 2020: 4; Karaduman, 2004: 73-92). Considering the new developments, circumstances, and legislative designs in historic preservation, the 1960s and 1970s witnessed a “better institutionalization and conceptualization of architectural and urban heritage” (Dinler, 2021). At present, the governmental institutions including the Ministry of Culture and Tourism, Directorate General of Foundations, and local municipalities are still primary actors in architectural preservation in Turkey, while the number of NGOs and their budget in the preservation field is rather limited. The Ministry of Environment, Urbanization and Climate Change, Directorate of National Palaces, General Directorate of Highways<sup>6</sup>, Turkish History Association, and governorships are other governmental insti-

tutions directly or indirectly related to heritage preservation.

## PRESERVATION IN THE USA

There were two distinct paths in preservation activities in the USA between the 18<sup>th</sup> and 20<sup>th</sup> centuries; private sector activities<sup>7</sup> and government involvement.<sup>8</sup>

Federal involvement in historic preservation, on the other hand, began after the American Civil War of the 1860s (Stubbs and Makas, 2011: 435). It was in 1872 that Yellowstone National Park was declared a national park of for the first time ever by the federal government, meaning that natural, together with cultural heritage, was accepted as properties that should be preserved (Lea, 2003: 3; Stubbs and Makas, 2011: 436; Tyler et al, 2009: 30, 61). The first federal funding for preservation activities was allocated for the Casa Grande ruin in Arizona, the nation’s first National Monument, in 1889, and similarly, Cliff Palace Dwellings of Mesa Verde gained a National Park Status. The Antiquities Act of 1906 was the first preservation legislation. The National Park Service (NPS), established in 1916, was the first governmental administrative agency, responsible for the protection of national parks and environments, and systematic management and administration of properties (Jokilehto, 2011: 263).

At present, NPS is also responsible for the development of historic preservation standards/guidelines (NPS, 2021a), funding and administration of federal historic preservation programs (NPS, 2021b), and works in collaboration with state and local governments, NGOs, individuals, and tribal communities (Tyler et al., 2009: 31-33). The National Historic Preservation Act (NHPA) of 1966 is the main preservation legislation at present. The American Battlefield Protection Act of 1996, Historic Sites Act of 1935, National Environmental Policy Act of 1970, Abandoned Shipwreck Act of 1988, Archaeological and Historic Preservation Act of 1974, and Archaeological Resources Protection Act of 1979 present other complementary legislation in the preservation field (NPS, 2021b; NPS, 2018a). Among them, thanks to the Historic Sites Act, an Advisory Board was created for National Parks, Historic Sites, Buildings, and Monuments (Jokilehto, 2011: 263). Historic American Building Survey Program (HABS; 1933), Historic American Engineering Record (HAER; 1969), Cultural Resources Geographic Information Systems (CRGIS; 1989), and Historic American Landscape Survey (HALS; 2000) were among the important contributions of NPS in documentation and recordation of heritage buildings, structures,

TABLE II PRIMARY LAWS AND CODE OF REGULATIONS RELATED TO HISTORIC PRESERVATION IN THE USA

1.	Antiquities Act	1906	27.	Preserve America	2003
2.	National Park Service Organic Act, SELECTIONS: NPS MISSION AND REPORTS ON THREATENED LANDMARKS	1916	28.	Sunken Military Craft Act	2005
3.	Historic Sites Act	1935	29.	National Women's Rights History Project	2009
4.	Federal Property and Administrative Services Act	1949	30.	23 CFR Part 771 Environmental Impact and Related Procedures for the Department of Transportation	2018
5.	National Trust for Historic Preservation	1949	31.	26 CFR Part 1.48-12 Income Tax: Investment Tax Credit for Qualified Rehabilitation Expenditures	2001
6.	Archaeological and Historic Preservation Act	1960	32.	26 CFR Part 1.170A-14 Income tax: Qualified Conservation Contributions	2017
7.	National Historic Preservation Act	1966	33.	36 CFR Part 60 National Register of Historic Places	1981
8.	Department of Transportation Act, SECTION 4F, HISTORIC SITES	1966	34.	36 CFR Part 61 Procedures for State, Tribal, and Local Government Historic Preservation Program	1998
9.	National Environmental Policy Act, SELECTIONS: PURPOSE, POLICY, AND INTERAGENCY COOPERATION	1970	35.	36 CFR Part 63 Determinations of Eligibility for Inclusion in the National Register of Historic Places	2011
10.	Coastal Zone Management Act, SELECTIONS: POLICY AND GRANTS	1972	36.	36 CFR Part 65 National Historic Landmarks Program	2003
11.	Department of Transportation Act, SECTION 4(I) – AMTRAK IMPROVEMENT ACT	1974	37.	36 CFR Part 67 Historic Preservation Tax Incentive Certifications	2012
12.	Mining in the National Parks Act, SECTION 9	1976	38.	36 CFR Part 68 The Secretary of the Interior's Standards for the Treatment of Historic Properties	2012
13.	Public Buildings Cooperative Use Act	1976	39.	36 CFR Part 73 World Heritage Convention	1982
14.	American Indian Religious Freedom Act	1978	40.	36 CFR Part 78 Waiver of Federal Agency Responsibilities Under Section 110 of the National Historic Preservation Act	1999
15.	Archaeological Resources Protection Act	1979	41.	36 CFR Part 79 Curation of Federally Owned and Administered Archaeological Collections	2012
16.	Commemoration of Former Presidents	1980	42.	36 CFR Part 800 Protection of Historic Properties – Advisory Council on Historic Preservation	2012
17.	Commission for the Preservation of America's Heritage Abroad	1985	43.	40 CFR Parts 1500-1517 Council on Environmental Quality	2011
18.	Abandoned Shipwreck Act	1988	44.	41 CFR Part 101-17 Assignment and Utilization of Space – General Services Administration	1998
19.	Internal Revenue Code, SELECTIONS: QUALIFIED CONSERVATION CONTRIBUTIONS AND REHABILITATION TAX CREDIT	1980	45.	41 CFR Part 101-20 Management of Buildings and Grounds – General Services Administration	1999
20.	Native American Graves Protection and Repatriation Act	1990	46.	43 CFR Part 3 Preservation of American Antiquities	2008
21.	National Underground Railroad Network to Freedom	1990	47.	43 CFR Part 7 Protection of Archaeological Resources	2012
22.	Intermodal Surface Transportation Efficiency Act, SELECTIONS: SCENIC BYWAYS PROGRAM	1991	48.	43 CFR Part 10 Native American Graves Protection and Repatriation Act	2012
23.	American Battlefield Protection Act	1996			
24.	National Marine Sanctuaries Act, SELECTIONS: DESIGNATION, RESEARCH, AND LIMITATIONS	1972			
25.	National Maritime Heritage Act	1994			
26.	Save America's Treasures	1998			

sites, and landscapes. The two divergent paths in historic preservation, namely the private sector and public activities, became a united whole with the establishment of the National Trust for Historic Preservation (NTHP) in 1949, a new quasi-public organization, aimed at linking the NPS and other federal preservation activities with the private sector. It was supported by federal funding until 1998, and then became independently and privately funded (Table II; Tyler et al. 2009: 61-62).

– **The Role of NGOs in historic preservation in the USA: history and development** – According to Tyler et al. (2019: 12, 29) historic preservation in the USA is based on a 'grass-roots' movement stimulated at the local level and then expanded onto larger contexts. Numerous associations were founded in the

early to mid-1800s, aimed at preserving the heritage. The protection of a log cabin in Philadelphia in 1749 was the first recorded preservation activity held by community efforts in the country and Independence Hall in Philadelphia was among the nation's first preservation efforts to save the building from demolition in the early 1800s (Murtagh, 1997: 1-2; Stubbs and Makaš, 2011: 429-430; Tyler et al., 2009: 27). Fort Wayne in Indiana and Fort Meigs in Ohio were the two major sites, where individual preservation efforts were observable as early as the 1840s (Tyler et al. 2009: 29). Mount Vernon Ladies Association founded in 1853 to save Mount Vernon, George, and Martha Washington's homestead is considered the first nationwide preservation organization (Jokilehto, 2011: 263; Lea, 2003: 2; Stubbs and Makas, 2011: 431). The Minnesota Historical Society (MNHS), established in 1849, was among the first historical organizations rapidly created by the Territory's legislature and acted actively in historic preservation. Guidance for the creation of the Itasca State Park in 1890 and long-term stewardship for the rehabilitation

6 It is responsible for preservation of historic bridges.

7 They mainly involved fundraising to save individual historic buildings and landmarks.

8 Government involvement mainly focused on the protection of natural parks, landscapes, and features (Tyler et al., 2009: 27, 42).



FIG. 2 VIEWS FROM WASHBURN A MILL COMPLEX – MILL CITY MUSEUM REHABILITATED WITH THE STEWARDSHIP OF MNHS

of Washburn-Crosby ‘A’ Mill Complex to be used as Mill City Museum were among the most prestigious works of the Society (MNHS, 2022; Fig. 2). In 1895, a decision was made to preserve the Adirondack Forest in New York as ‘forever wild’ via a public-private partnership (Tyler et al. 2009: 61). The restoration of the original colonial town of Williamsburg in 1926 was the first effort to preserve an entire city with the generous support of John D. Rockefeller. Similarly, Henry Ford sponsored the Greenfield Village preservation project in 1929. Charleston became a pioneering example to save the whole district, where the local citizens and planners established an ordinance to protect the district in 1931 (Jokilehto, 2011: 267). Philadelphia Centennial Exposition (1876), Columbian Exposition (1893), and Bicentennial Celebrations (1976) were the other noteworthy achievements of preservation activists (Dişli, 2013: 36). Especially between the years 1966-1976 many private preservation associations were established including the Victorian Society, Friends of Cast-Iron Architecture, Association for Preservation Technology (APT) International, and the Society for Commercial Archaeology (Shehada, 2020: 116; Tyler et al. 2009: 35-39,

54), and in the mid-1960s, the first Historic Preservation Graduate Program was initiated at Columbia University by James Marston Fitch (Jokilehto, 2011: 269).

– **General tendencies and institutional development in historic preservation in the USA** – As understood from the above mentioned literature, early attempts for preservation activities were mainly conducted by private citizens and local or nationwide associations/organizations, which all contributed to the public awareness and knowledge in the preservation field in the early 19<sup>th</sup> century, even though most attempts failed to reach success (Jokilehto, 2011: 263). Private sector activities in the early years were mostly developed upon significant figures, events, or structures, whereas the government focused on the preservation of natural landmarks and parks and took virtually no active role in the preservation of historic buildings. Regarding “why” to preserve, patriotic reasons were more prominent than the architectural history, in preservation activities. Similarly, the older the better was the dominant thought (Tyler et al., 2009: 27-30).

In addition, according to Murtagh (1997), the assertion of legitimacy, history for reassurance, and use of preservation as defense against cultural and political hegemony were among other reasons and stimuli, and women were highly dominant figures in preservation practices. Compared to today’s organized and systematic activities, the preservation movement has changed dramatically since its early years. At present, local, state, and federal government institutions work together with nonprofit organizations to support the preservation activities. With the acceptance of NHPA in 1966, significant structural changes, changes in the way of the perception of preservation, and its main actors were observable. Entire areas were designated as historic districts, recent buildings were also included in the National Register depending on their significance, and heritage tourism activities increased largely. Similarly, with the Tax Reform Act in 1976, private sector involvement in preservation activities multiplied largely thanks to the tax incentives/tax cut, which turned historic structures into financial opportunities and a part of the business, rather than obstacles for development.

Preservation of old buildings, especially adaptive reuse became an important stimulus for urban revitalization and renewal, and the Main Street Program of the 1980s promoted this effort. All these perspectives also encouraged and increased the number of preservation activists and advocates (Tyler et al., 2009: 53-55, 60).

### CROSS-CULTURAL COMPARISON AND POSSIBLE KNOWLEDGE TRANSFER VALUES / INTERCULTURAL EXCHANGE OF EXPERIENCES

In this section, based on the above-mentioned descriptive part in which differences between the Turkish system and the system in the United States have been argued, together with an illustration of the links and relationship between the two countries. What follows is a suggestion of the possible intercultural exchange of experiences and knowledge between the two countries, by cross-replicating some aspects of the system. As for the differences, thanks to the Ottoman waqf system and its role in preservation in Turkey, a financial source for the repair expenses of waqf buildings is already present through their income-generating properties (called *'akar'*). Even though waqf was a private enterprise when it was first established by philanthropic people, at present it is transferred onto the state institution of Directorate General of Foundations (DGF). In the USA, similarly, there are federal trusts, but different from the waqf system and DGF in Turkey. They do not have a permanent financial source and have to create their source of income when the preservation need arises, and there is not a central institution like DGF for the management and administration of federal trusts. A comparison between Turkey and the USA also reveals that the establishment of NGOs in the preservation field was much delayed in Turkey. It was in the 1990s that the private sector inclusion and the number of preservation organizations increased substantially in Turkey (Şahin-Güçhan and Kurul, 2009: 38). Yet, none of the early organizations active in historic preservation in the late 19<sup>th</sup>-early 20<sup>th</sup> centuries is existent today or if they are, they changed their fields of activity (Keskin, 2015: 185). Contrary to the rapidly increasing private sector involvement in the USA, civil society organizations in the preservation field in Turkey do not show such fast development. Also, NGOs have an enormous stimulus both in the development of historic preservation studies and in increasing community awareness in the USA. In the same way, Watt (1991: 247) argues that "America is a 'strong' nation with a 'weak' state (contribution)" compared to other European countries. American civil society organizations such as APT, Presidio Trust, NTHP turned into huge institutions carrying out preservation studies and giving training throughout the country. In Turkey, on the other hand, governmental involvement and revenue as a percentage of preservation activities in comparison with the private sector, are much higher than in the USA, and there is a more centralized system both in terms of regulations/jurisdictions and admin-

istration of heritage foundations. However, in the USA, individual/private support is the main financial source for preservation works, and jurisdictions of preservation organizations are rather minimal (Dişli, 2013: 116-117).

Regarding the links and relationship between the two systems and countries, neither the architectural nor the historic value of the heritage buildings were the main stimulus for preservation activities at the beginning. Rather, it was mostly either the economic, functional values of the heritage or religious conservatism and later national prestige in Turkey or patriotic reasons in the USA. Yet, in both countries, the activities of preservation organizations and individual contributions have been supported by the state. As an instance, the TURING Association, ACRM, and Bursa Assembly of Advocates of Ancient Monuments (1946) were all declared public-benefit associations and supported by the state. However, changing and developing conditions forced these associations to leave their activities to state institutions in Turkey. Increasing public awareness on repairs, fundraising activities from philanthropic citizens, congress organizations, and detailed archive research were among the main activities of the NGOs (Keskin, 2015: 186). At present, preservation organizations still conduct similar activities in Turkey, but only in some rare cases do private organizations such as Koç and Sabancı Foundations or individual philanthropic citizens undertake all financial burdens of restoration works. Similarly, both countries have quasi-public organizations active in preservation activities, such as National Trust for Historic Preservation (NTHP; 1949) in the USA and Historical Cities Association (HCA; 2000) in Turkey. They either provide the link between the federal state or municipalities with the private preservation bodies. In addition, as Luke (2018) pointed out, in multi-ethnic communities such as Novi Pazar in Serbia, both Turkey and the USA play a strategic role in heritage programs, by either using their neo-Ottomanism or Americanism ideologies, causing the heritage, identities, and developments in those regions to compete with each other. Americanization movements were acknowledged in Turkey, especially in the early 1950s with the Marshall Plan and Turkey's NATO membership, reinforcing the USA-Turkey alliance. The establishment of the High Council (1951) also coincided with this alliance, and up till the end of the 1960s, the USA support was observable in historic preservation activities in Turkey (Dinler, 2021). As another similarity and link between the two countries, preservation education at the university graduate level started in the same years, at the beginning of the 1960s. What is even more, the historic pres-

ervation program at METU in Turkey was founded with the aid of the USA, with the aim of addressing the needs of the Middle East (Dinler, 2021). However, in the USA, the preservation program is more interdisciplinary and gathers students from different departments, except in the case of architecture. At present, in addition to graduate-level historic preservation programs, universities in both countries also have four-year or two-year bachelor/minor degrees and certificate programs in heritage preservation.<sup>9</sup> In addition, in both countries, there are either tax deductions or inceptions in preservation activities done by private bodies, but it is not the primary stimulus for the ones in Turkey, though highly important in the USA. Similarly, both countries have their own regulations and organizations related to historic preservation that emerged in similar periods. In Turkey, it was around the mid-19<sup>th</sup> century that the first regulations were adopted and the institutionalization of the waqf system was acknowledged. In the same way, federal involvement in the preservation field was observable in the 1860s in the USA and it was in the early 20<sup>th</sup> century that the Antiquities Act came into force.

As for knowledge transfer values and intercultural exchange of experiences between the two long-established systems, the situation is as follows:

- It is suggested to give structure to the highly developed voluntarism, citizen initiative, and private contribution in historic preservation activities in Turkey like in the United States. Preservation funds and funding institutions in the USA, as well as tax incentives programs, contain the potential knowledge transfer values for Turkey. In the same way, the waqf-based buildings in Turkey, which already have a financial source for their preservation and are tax-exempt in their repairs, together with the centralized and autonomous administration and management system for the waqf income and private preservation foundations in Turkey, make it possible to organize predetermined preservation decisions. This might have transfer values for the USA.

- In addition to the waqf-based buildings, which were initially repaired with philanthropic activities, the preservation of the remaining Turkish cultural heritage resources have progressively transferred to the centralized government level, making a more systematic decision support system possible. Each year, the related bodies of the Central State System of Turkey decide on the needs for preservation and allocate financial resources either from their waqfs (if existent) or from the State Treasury. Although this system seems to be a burden for the State, it

also provides a kind of a guarantee for sustainable preservation and management of historic properties; this might be a knowledge transfer stimulus for a de-centralized federal state structure in the USA.

- Similarly, the highly strong collaboration between the state and non-profit organizations, namely the public-private partnership to support preservation activities, deserves to be transferred from the USA to Turkey, where the state-NGO collaboration in preservation works is also existent, but is still rather weak.

- Both early and present examples of public participation in heritage preservation activities in the USA have promoted sustainable community engagement in heritage actualization (restoration/adaptive reuse practices), education, publicity programs, cultural heritage tours, and most private organizations continue their preservation activities. In Turkey, on the other hand, early examples of preservation organizations do not exist, and new ones are not active enough compared to the ones in the USA. That is why the motives or the stimulus for community involvement in heritage preservation activities in the USA might have transfer value for Turkey.

- Public participation is possible Conservation Boards' sessions on the decisions on heritage properties, such as listings in the National Register, in the USA. In Turkey, on the other hand, only authority bodies (institution representatives), are permitted to participate in the Conservation Board meetings and have the right to comment on their decisions. A more open and transparent structure of the USA Conservation Board meetings could, therefore, be transferrable to Turkey, in order to achieve a more participatory decision.

- In the USA, NPS is responsible for the preparation of all kinds of standards related to historic preservation, and in Turkey, the Ministry of Culture and Tourism is the main legislative body. When compared to the preservation laws, standards, regulations, and guidelines, they are far more advanced in the USA com-

<sup>9</sup> As an instance, in Turkey Hacı Bayram University, Department of Conservation and Restoration of Cultural Heritage, Ankara University Department of Conservation and Restoration of Cultural Properties give four-year restoration bachelor education, and there are many higher vocational institutions with a two-year restoration education (see: CHE, 2022). Similarly in the USA, Eastern Michigan University, Ball State University, Shepherd University and many others have historic preservation minor and certificate programs (see: Preservation Directory, 2022).

<sup>10</sup> For instance, in Turkey there is not a specific regulation/standard/principle decision on refunctioning/adaptive reuse of, or new exterior/interior additions to historic properties (see: MoCT, 2022b; TR-PLDS, 2022), even though they are highly important issues that should be clearly explained. Whereas, in the USA, there are specific guidelines on these and many other preservation related issues (see: NPS, 2021a).

pared to Turkey, meaning that there are clear regulations in nearly all preservation-related issues in the USA. Yet, in Turkey, standards, laws, and by-laws fall short in some preservation aspects<sup>10</sup>, and variable decisions of responsible Conservation Boards are applied for the basic preservation decisions that are not included in primary regulations. In other words, highly developed standardization activities of the USA have knowledge transfer values for Turkey.

– Although in the USA universities accept students for the historic preservation graduate programs from all disciplines in addition to architecture programs, in Turkey, most universities accept only architecture students at the graduate level. That is why the interdisciplinary nature of the USA universities has transfer value for Turkey universities. Considering that students who graduated from these programs are potential advocates of private organizations, NGOs, and community engagement in preservation practices, it is important to increase the interdisciplinary nature, quality, number, and alternatives for historic preservation degree/certificate programs.

## CONCLUSION

The paper compared differences and similarities in state and community-based historic preservation mechanisms and policies in Turkey and the USA, with the aim of revealing possible knowledge transfer values for each other. The history and development of community engagement, namely through the waqf and NGO system, their role, and main legislation and tendencies in historic preservation in both countries were examined for a better understanding of the background and its implications in preservation practices. The role of private actors in the preservation of historic properties is particularly sensitive, both in Turkey and in the USA. Although not always in terms of financial support, they generate reactions and engender fundamental questions for the repair of historic buildings, districts and even cities. The research found that the development of preservation legislation in the USA and Turkey progressed differently. While in the USA, parks, and landscapes were the main interest of the government, movables, and museum objects were

given greatest importance in the 18<sup>th</sup>-19<sup>th</sup> century legislations in Turkey. The private sector involvement and contribution supporting preservation activities also show differences, such that in the USA, NGOs played an important role in local, national, and federal levels since the early periods and either patriotic reasons or tax incentives increased the private sector contribution. Yet, in Turkey except for the classical waqf system, neither the financial power nor the number of NGOs was high and effective in preservation activities. Rather, it is the government that holds the majority of repairs. The main reasons for giving and volunteering were benefactions rather than financial incentives at the beginning. The 1960s-70s could be considered the time for the development of comprehensive preservation legislation in both Turkey and the USA and the concept of site/district conservation. Overall, they both proved to be effective in heritage preservation, no matter whether state-funded or privately-funded practices are dominated. In addition, both the deep-rooted waqf system of Turkey and the long-established NGO system of the USA contribute significantly to the preservation of heritage and have possible knowledge transfer values for each other. All the state institutions and NGOs/ private bodies / community involvement are equally essential actors, and beyond their individual improvements, more collaboration among them should guarantee more increased improvements in preservation works. Similarly, Bahçeci and Yenel (2019) point out the importance of a strong and mutual collaboration between the state, local municipalities, civil society organizations, and the private sector and suggest creating a common platform and a network that will enable them to easily interact with each other. That way it would be possible to provide better management and preservation of the heritage. This study similarly, suggests that the relationship between the built environments and their users/community contribution should be ensured for their management and sustainability. In the same way, the lessons learned from the comparison of Turkey and the USA, their different approaches, private sector contribution, and legislations in preservation, might have the possibility of adaptation and application in different national contexts.

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- #### SOURCES OF ILLUSTRATIONS AND TABLES
- FIG. 1 Photo archives of the author, 2018-2020, Ankara, Turkey
- FIG. 2 Photo archives of the author, 2012, Minneapolis, USA
- TABLE I ŞAHİN-GÜÇHAN and KURUL, 2009; TR-PLDS, 2022
- TABLE II NPS, 2018a; NPS, 2018b; NPS, 2021b
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