

Comparative Contextual Interpretation of the Conservation of Cultural Heritage in the USA, France, and Egypt

Ziad M. M. Shehada

¹(Department of Architecture, University of Malaya, Malaysia)

ABSTRACT : *Heritage is regarded as our inheritance from the bygone. It is what we live now and what we hand on to the future generations. However, the level of interest varies from country to country. While developed countries have come a long way in this field, developing countries are still struggling to catch up with them. Henceforth, the objective of this paper is to review the history of conservation movements in various cultural and geographic contexts (US, France, and Egypt), and analyze the evolution of the conservation of cultural heritage in a comparative way, besides, to find out the key issues influencing the conservation process. The researcher follows the historical and contextual analysis method to compare among the countries and generate the Inferences. The evolutionary study of these countries provides a broader and deeper understanding of the conservation mechanism which affects the development of the cultural heritage in the other countries.*

KEYWORDS: *Conservation, Contextual interpretation, Cultural Heritage, Egypt, France, USA*

I. INTRODUCTION

Conservation management of heritage requires significantly some different types of interventions in the historic settings. More importantly, the researcher reviews different conservation movements in several contexts. For example, the U.S., France, Egypt are particularly selected because they have established an advanced and mature conservation process, have wide experience in the field of heritage conservation, and possess contrasting examples in conserving the cultural heritage.

II. UNITED STATES OF AMERICA

Conservation started initially during the nineteenth century as a grassroots movement aided by enthusiastic individuals and historical societies motivated by piety and philanthropy. Nevertheless, Americans' feelings towards history, past events and monuments were continuously changing with time [1]. Enthusiasm for the preservation of past events was preceded by anti-historical feelings and disengagement from the past during the first decades of nationhood. For the American mind, the significance of nature, wilderness, open space and natural resources was instrumental in the designation of national park sites in the second half of the nineteenth century [2]. Conserving nature and wilderness aesthetics were the main concerns of the pioneers of the preservation movement., Since then, a separation subsequently occurred between the efforts to conserve the natural environment and those to conserve the well-built and man-made environments [3].

Moreover, the Antiquities Act of 1906 was the first legislation tackling the historical resources of the country. It emphasized the preservation of American antiquities and declared national monuments. The National Park System Organic Act of 1916 was the driving force behind the foundation of the National Park Service in

the Department of the Interior [4]. Hence, the government was involved at that time in nature conservation, and recreation was advocated as a counterbalance to the pace of modern urban life. In the 1920s, the emergence of outdoor museums and the designation of the first old historic had distinctly appeared in downtown Charleston and South Carolina, and thus in 1931 the way was paved for the Historic Sites and Building Act of 1935 [5]. Then, the 1935 act created a National Register of historic sites, which was excessively expanded in the 1960s. later, On October 15th, 1966, the passing of the national historic preservation act was regarded as a landmark for the preservation movement in the US. Hence, the act expanded the National Register to include districts in its listings of historic places [6]. In 1969, the national environmental policy act was passed. Further, the Act triggered studies on environmental impact regarding the effect of federal projects on natural resources, wildlife and historical surroundings [7]. In 1976, the tax reform act was then passed; written especially for buildings and providing more incentives for certified preservation projects in the form of tax cuts [8]. It is important to notice the trickle-down effect of legislation in the US, what the legislation signifies and the effects on the architectural heritage. The 1966's act had a tremendously positive effect on the preservation movement in the US. In 2016, the united states of America enacted a new Act to "Protect and preserve international cultural property at risk due to political instability, armed conflict, or natural or other disasters, and for other purposes" [9].

Furthermore, the evaluation criteria used in the 1935 Historic Sites Act were based on the 1934 evaluation criteria, confirming during that period that evaluation criteria were dominated by historical associations with little consideration to architectural merits [10]. In 1949, a private national Council for Historic Sites and Buildings was established prior to the founding of the National Trust for Historic Preservation [11]. Thence, the council issued selective criteria, which included a reference to buildings and sites of local, state, or national significance, yet some architectural or artistic values were not fully incorporated.

Consequently, in 1954 the Supreme Court issued that the community should be beautiful as well as healthy, triggering attention to community aesthetics, to architectural and artistic values in evaluating sites and buildings [12]. In 1956, the evaluation criteria were revised by the National Trust for Historic Preservation, to include structures and the acknowledgment of distinctive features of architectural styles. This was the first time that architectural merits were formally stated in any evaluation criteria [13]. After ratifying the 1966 national historic preservation act, the evaluation criteria arrived at a matured stage, accounting for aesthetic as well as artistic values in addition to the informational values of the architectural heritage [14]. More necessarily, in order to be listed in the national register, the properties had to be at least 50 years old. This 50-year threshold is justified because the time issue is necessary for the objective evaluation of buildings and sites preservation efforts that must be based on more than the current taste. During the middle of the 1980s, the preservation movement witnessed a rise in the preservation of historic landscapes. What was significant about landscape preservation in the 1980s and 1990s was that landscapes became interesting for their own sake and not merely as building surroundings [15]. This triggered the development of evaluation criteria and strategies for the preservation of rural, historic landscapes which increased the value of intangible cultural heritage.

Furthermore, identification of the architectural heritage have always been the cornerstone in US preservation methodology. For example, the National Park Service and State Historical Commissions conducted different kinds of a survey to find and identify cultural heritage. Such surveys included some reconnaissance and intensive fields. Followed often by documentation, surveys were usually composed of three parts; measured drawings, written record of historical contexts, and large format photography. Such a complete record is valuable when intervening in resources or in cases of natural or man-made disasters. Hence, National Registers serve not only as lists of historical places and buildings, but it can also be regarded as planning tools in cases of development or interventions [16]. Each state holds its own public meetings to discuss such nominations. The Board decides whether to accept or refuse the nomination, after which the decision is passed on to the state historic preservation officer (SHPO) who respects the Board's decision, but usually makes the final judgment.

Subsequently, in the US the creation of social order through preservation was importantly a recurring theme during its 200 years of development and evolution. Thus, historic preservation first emerged in the US during the nineteenth century as an effort to derive national identity via cultural affiliation to important buildings, sites, persons and past events [17].

III. FRANCE

At the beginning of the nineteenth century, the architecture profession associated with the practice of conserving historic monuments was run and administered by the French government. Popular private efforts in conservation followed in the early twentieth century. A broad span of buildings was under the control of government such as universities, libraries, prisons and hospitals. Therefore, the origins of the conservation movement in France were in art and architecture rather than in history and historical societies [18]. Pro-conservation legislation evolved tremendously from the laws supported the conservation of national-singular monuments to whom supported the conservation of ordinary monuments, whole settings and neighborhoods. Passed in 1887, the first conservation law was empowered by the Minister of Public Instructions and Fine Arts to list whole or parts of buildings that were of national benefit from the viewpoint of art or history [19]. With this law, the Commission of Historic Monuments acquired the power to supervise work on historic buildings. The law also restricted private ownership in the name of public interest.

Additionally, in 1913, a law for protecting and conserving of historic monuments was ratified. More particularly, this law only addressed individual buildings and introduced a classification system of monuments, dividing them into two categories; Classified monuments and registered monuments [20]. In 1930 the Natural Monuments and Sites Law was passed, considered as the first law to address natural sites. This law signaled the beginning of integrated conservation, but urban settings were still not incorporated [21]. The Law of 1943 addressed the protection of immediate surroundings of protected monuments. The law called for the protection of the built and rural areas within a 50-meter radius of architectural heritage. The 1962 Malraux Law addressed the protection and conservation of historic quarters, neighborhoods and expanded the concept of protected sectors to urban housing and quarters possessing architectural value. This law contributed to the maturation of the concept of integrated conservation rather than the protection of singular monuments. [22]. In 2001, Association for National Archaeological Excavations developed a law. This law has European legal basis in the Malta Convention signed on early 1992. In 1980s, archaeology dealt with invisible remains just as much as visible ones until 2004 when this article was revised [23].

The introduction of the 1930 Natural Monuments and Sites Law and this supplementary list divided historic monuments in France into two groups; Classified Monuments and Registered Monuments. Evaluation or selection criteria in France have always been based on an abstract scale of aesthetics and historical importance. The French classification or grading system can be useful when only parts of a cultural resource retain integrity or when some parts possess more significance than others [24]. In addition, the lesser grade allows more possibilities for intervention, encouraging people to accept the classification, especially for registered monuments. The French grading system demonstrates a balance between private ownership and public interest. Such a balance is embodied in the way people define their responsibilities towards their cultural heritage.

Moreover, the process for listing a historical and cultural resource started with obtaining the opinion of the Commission of Historic Monuments. Next, an analytical study of the property was conducted and produced in a report. The dossier went to the Inspector General of Historic Monuments, and finally, registration was announced in an ordinance issued by the Ministry of Culture and the Environment [25]. There were lists for every functional region in France. Total classification meant that the whole resource was listed and partial classification meant that only part of the resource was listed. Promotion, advocacy including public awareness are important bridges between government and private efforts in the French conservation system. Many national and local art, archaeology and conservation organizations were founded such as the Friends of Parisian Monuments, the Commission of Old Paris, and the Touring Club of France. These private organizations were established at the beginning of the twentieth century [26].

Furthermore, during the period between 1954 and 1974, Paris went through an astonishingly rapid physical redevelopment, with demolition and reconstruction encompassing no less than 1,200 hectares or 24% of the buildable surface of the city [27]. Coordination between different governmental agencies concerned effectively with planning and conservation on one hand and between those agencies and the local public on the other hand. As an example of this coordination was the famous Scheme of 100 town centers in 1974. Priority was given to 100 towns whose architectural legacy seemed to be in jeopardy [28]. The Scheme called for

carrying out architectural studies that included documentation of the historic structures, which sought for means of revitalizing, rehabilitating old structures and buildings. The designation of a protected sector was usually done in collaboration with the local government authority.

IV. EGYPT

The origins of historical and cultural conservation in Egypt were rooted in antiquities protection and settlement archaeology. During the reign of Muhammad Ali (1805–1848), antiquities protection was extremely modest and inefficient. Hence, Egyptian antiquities were plundered by foreigners, treasures and monuments smuggled abroad[29]. In addition, the decline in the popularity of the medieval Islamic architecture led to a break in its evolution. Due to political reasons, European styles became very popular and widely used. Pharaonic antiquities' protection was started by foreign archaeologists and orientalist who came to Egypt along with several expeditions[30]. The nineteenth century brought the intellectual tradition of the European method of documentation and analysis to Egypt through the work done on its ancient monuments, arts, traditional life and Islamic architecture [31].

The archaeology/tourism paradigm dominates the structure, philosophy and approach to conservation in all different governmental organizations. The 1912 law carried a clear alignment for the benefit of historical Egyptian antiquities, not Islamic or other antiquities dating to later periods of Egypt history. The law addressed singular monuments rather than integrated areas. Other laws that followed, such as the 1918 law, unfortunately, was not properly implemented by the Egyptian authorities due to the nature of the Department of Antiquities [32]. The structure of the Department of Antiquities, its philosophy, directorship and mission are organized around settlement archaeology. [33]. The 1951 law was designed to address the problem of antiquities smuggling. The main bias in the law, in addition to its static turning point (1880), was that it did not deal with the issue of maintaining an integrated historic and cultural environment; but it addressed historic monuments as separate isolated entities[34]. The early 1990s marked the establishment of a Cultural Resources Management (CRM) program in Egypt at the American Research Center in Cairo. The CRM approach was biased since it limited the concept of management to salvage archaeology [35].

In 1983, Law No. 117 was ratified, in 2010, the regulations were issued, and the law was updated. A new Law No.144 about the conservation of architectural heritage was enacted in 2006. The law was concerned of protecting the buildings of high distinctive and heritage value[36]. The latest law in Egypt was the Urban Harmony Law No. 119 ratified in 2008. The law, in addition to the regulations, was responsible for the conservation of the areas that carry urban characters and distinctive architectural value, as well as buildings and other natural elements. However, the 2008 law is only interested in the monument context and urban area, but not the monument building itself [37]. As the law defines the monument boundaries, frontiers, and the buffer zone, it only works as a complementary law to conserve the whole context in an integrated way.

Nevertheless, the problems faced the historical and cultural conservation in Egypt are numerous. For example, in 1951 a survey of the Islamic monuments was conducted in Cairo, revealing that 456 monuments were registered, yet their number is currently dwindling at an exceedingly alarming rate [38]. It has been proven in Egypt that pro-conservation legislation alone is not enough to protect, yet it can only conserve historical and cultural monuments. In addition to legislation, there is a need for an infrastructure for conservation. This includes developing methods and strategies, promoting local and private support for conservation in the form of financial aid, and pro-conservation programs and activities.

In the nineteenth century, there was no coordination between different ministries to study the effect of planning on historical monuments and neighborhoods. Under the direction of the Minister of Public Works, public works and several engineering projects in Cairo and other cities during the reign of Khedive Ismail (1863–1879) resulted in a prestigious urban center on a Haussmann-type plan between Cairo and the Nile [39]. Destruction in the name of planning occurred again during the 1930s and 1940s when small houses, villas including public buildings dating from the turn of the century were demolished to make way for large projects and big apartment buildings. Planning projects and schemes during the 1950s and 1960s led to further massive destruction of the historic environment [40]. Between the 1970s and the 1990s, many of the urban development

projects within the Ministry of Housing, Reconstruction and Planning provided only unimplemented recommendations for the development of the infrastructure [41].

In 1977, the Association of the Urban Development of Islamic Cairo was founded in order to reinforce the activities of the Department of Antiquities. In spite of the small in size and budget of the association, the intention is signaled in terms of establishing a national organization for conservation that coordinates different governmental agencies for the conservation as well as protection of the historical and cultural heritage [42]. The Department of Antiquities has caught the interest of several European countries with cultural and archaeological institutions in Cairo to undertake various conservation projects. The adaptation and rehabilitation philosophy adopted by foreign conservation institutes, some local architects and conservationists when dealing with the historic monuments of the medieval or nineteenth century. Cairo has been offering a long-term solution to the problems of conservation in the country. Mere restoration offers only a temporary solution, after which the same problems would arise. This adaptation and rehabilitation philosophy ensure the continuing maintenance of such resources and aims at reintroducing them into the lives of the Egyptians.

V. ANALYSIS OF THE EVOLUTION OF CONSERVATION MOVEMENTS

Analysis of the evolution of conservation movements in the USA, France, and Egypt focused on the most important aspects affected the conservation process:

1- Roots

In USA, between 1770–1800, Nature and Native Americans worked as substitutes for the lack of history in the new nation in comparison to Europe, while in Nineteenth century Foundation of private historical societies and groups concerned for local history and genealogy. The number of historical societies reached 78 in 1875 and Preservation was driven by piety and private support. In France, early nineteenth century, emergence of government architects engaged in building monumental Paris. The profession of architecture together with the business of conserving buildings was run and administered by the French government. In 1837, establishment of the Commission des Monuments Historiques, a national organization that dealt with the protection and conservation of historic monuments in France. In Egypt, during the reign of Mohammed Ali, antiquities protection was extremely modest and had little effect. Egypt's antiquities were open to plunder by foreigners and many were smuggled abroad. At the twentieth century, the paradigms of archaeology and tourism continued to define "antiquities" rather than defining historic and cultural resources significant to the masses.

There are Different roots for the conservation movement in the three countries which affected the future of conservation and the evaluation criteria in each of them. In the US, the roots were in history (social and political); this has been affecting the evaluation criteria even until the present. The roots of the conservation movement in France were in art and architecture rather than in history (the movement since its beginnings was dominated by architects). This led to the influence of artistic and architectural merits on selection criteria. In Egypt, the roots of the movement were in antiquity restoration and settlement archaeology, which created a conflict of interest and approach between the archaeology/ tourism paradigm as well as the cultural conservation paradigm. In the US, preservation started as a grassroot movement with the effort of many historical societies as well as individuals motivated and driven by pietism. In France, the architecture profession and the conservation of historic monuments was administered by the French government. Private efforts in conservation followed later on in the early 20th century

2- Laws

In USA, development of many acts to protect the cultural heritage such as the National Park System, Antiquities and national monuments act, Historic Sites and Building Act contributed in creating National Register of Historic Places (NR). While in France, first was the establishment of the Commission of Historic Monuments, then many laws had been issued respectively; conservation law for the Protection and Conservation of historic monuments, Protection of Natural Monuments and Sites, and Malraux's Law. In Egypt, definition of ancient monuments in 1912 Law carries an obvious inclination for the benefit of historical Egyptian antiquities over Islamic ones of medieval times or later. Later, 1918 law Protects the Monuments of the Arab Era. The

turning point after which monuments were not considered historic was 1848. This point changed in 1951 Law to be 1880.

Progression of pro-conservation laws in the United States of America and France from those that support the conservation of national, singular monuments to those that support the conservation of ordinary historic monuments, whole settings and neighborhoods. Trickle-down effect of legislation in the Western World (USA & France). What the legislation signifies and the effects it has on the historic and cultural resources are important. The 1960's could be considered the time for the development of "integrated conservation" in both France and the USA. The maturation of the concept of conserving whole sites rather than singular monuments.

In the 1930's, a grading system to classify historic and cultural monuments was introduced in France (Supplementary list); this could be considered the main difference from the US and Egypt. In Egypt, currently legislation concerning the conservation as well as protection of cultural and historic resources stops at the definition of antiquity, listing and registration. There are no clear provisions for the effects of registration and intervention in historic settings. In addition, the legislation does not address the issue of integrated conservation. The laws carry an archaeological bias in their definition of "antiquity" (even though it is dynamic in its definition of the point in history after which monuments started to be considered historic). Selection criteria are presently well-defined in the US. However, no clear criteria exist in France and Egypt (historic and artistic merit).

3- Significance

At the nineteenth century in USA, the beginning of the historic preservation movement. Evaluation criteria formulated by the National Park Service; however, it is still not enough consideration given to artistic and architectural values. Architectural merit in evaluation criteria formally stated but it was not law yet. Expansion of NR criteria had done in 1980s. In a conservation document dating to 1873 in France, no mention whatsoever was made of historical values. In 1943 Law, immediate surroundings of protected monuments; concerning criteria for selection was on physical and visual aspects of urban life. In Egypt, the dominance of the archaeology paradigm in the definition of antiquities was too clear in 1882. No clear criteria in 1951 Law as a; criteria of turning point was still not dynamic; monuments of lesser or modest artistic value were not addressed. Later, 2008 law works as a complementary law to conserve the whole context in an integrated way.

The evolution of the significance (including evaluation criteria) of historic and cultural resources through time (what was considered of value 50 years ago is different from what is considered of value today). Any evaluation criteria should take this dynamic concept of significance into consideration. Evolution of the significance concept in the USA through three main stages: 1. the national history stage, 2. community aesthetics stage, 3. multiculturalism and ethnicity stage.

The lack of a clear evaluation criteria of the significance of cultural and historic resources (as the one developed in the USA) in France, and Egypt. The criteria still used today is vague and limiting (historic and architectural merits). Critique of the evaluation criteria (a, b, c, and d) and criteria consideration: Critique of the federal assumption that significance is inherent and is based only on sense experience; a cultural property would either possess it or lack it. In addition to the inherent values, meaning is also assigned by human mind and is subject to difference among persons and to alteration out of time. This notion that significance is a dynamic concept mainly affects strategies rather than current criteria because nobody can predict changes in the future. Greater focus on recent history; shift in historic documentation from major events in the lives of famous people to ordinary affairs of common individuals.

4- Effects

In USA in 1950s, there were negative effects of urban renewal programs on preservation, destruction by planning, social displacement and gentrification which led to concern about the quality of the built environment. In France, French revolution, political and social upheaval in 1789 led to the destruction of many historic buildings of previous times. Haussmann's work in replacing Paris between 1853 to 1870 caused severe clearing activity of historic monuments and districts. In Egypt, Laying out of a prestigious urban center on a Haussmann type plan between Cairo and the Nile. The consequences of such plans on the historic fabric were

tremendous: The destruction of historic environments, changing of the historic character of the city, social and economic segregation, breakdown of social and economic structures.

Destruction of historic monuments and whole neighborhoods in the name of planning and political order caused, as a consequence, social and economic segregation. Obliteration of visual landmarks occurred in the three precedent studies. Urban renewal programs, large-scale planning projects and transportation networks after the Second World War caused a lot of the destruction of the historic fabric. As a reaction, urban design replaced urban planning. The notion of coming back to old city cores in the form of festive markets as a reaction to the "creative destruction" in the USA. Master plans for the city had first been established in the 1960s and then in the 1970s, when the Beirut municipality asked the Association Parisienne d'Urbanisme to establish an urban master plan for the city center. But these master plans were not executed because of the war, resulting in a complete lack of urban planning which endangered any buildings or neighborhoods worth preserving.

5- Private Organization

Since the eighteenth and nineteenth centuries, there were many efforts of individuals and private historical societies to preserve the cultural heritage in USA. National Register nominations could be triggered at any level, even at the level of individuals who could also participate during the Board of Review Meeting, held at the state level to decide on nominations for the National Register. In France, many National and local organizations of art and architectural preservation such as Société des Amis de Monuments Parisien and the Commission Du Vieux Paris were established. One of the first protected sectors selected as a result of a national survey was the Marais area in Paris. Owners of designated historic monuments paid up to 60% in restoration and maintenance cost. Official Egyptian bodies were handicapped by lack of funds; therefore, a leading role in the fight to save the medieval cities and monuments fell to semi-official, private bodies as well as to foreign and international agencies. An Association of the Urban Development of Islamic Cairo was founded in 1977 to influence the way the city is developed.

Essential role of private agencies and individuals by the success of cultural conservation and the introduction of conservation as a public value (conservation as a grass-root movement). In the USA, preservation started as a private effort of historical societies and associations. Their efforts had a tremendous effect on preservation movement (Henry Ford's village at Dearborn and Colonial Williamsburg helped to bridge the development from outdoor or house museums to historic districts). Preservation was driven by piety and private support. Private organizations for conservation facilitate public participation in the movement. The importance of taking into consideration local input (in addition to the experts') in the designation and registration of historic monuments and neighborhoods. Private efforts in conservation appeared at a later stage (20th century) in France and consisted of private societies in art and architecture rather than historic associations. Currently in France the public (owners of registered historic monuments) shares with the government the expenses of protection, maintenance and restoration of historic monuments (50-60 % of cost). Designation is an honor that everybody seeks.

Role of private sector in cultural conservation, especially in a country like Egypt with so many problems faced by conservation today. In Egypt today, the role of private agencies becomes more essential since the official Egyptian bodies are handicapped by lack of funds and technical assistance. Advocacy for conservation and awareness becomes essential steps in any conservation methodology within such a context. Advocacy includes the responsibility of conservationists to seek new uses for old buildings since more restoration is not going to solve the problems.

6- Coordination

National Historic Preservation Act 1966 was a keystone in the preservation movement in the US. This act established the Advisory Council on Historic Preservation created a State-level appointee and expanded the NR to become a planning tool rather than just a list of historic monuments. The Department of Housing and Urban Development was not very cooperative with conservation agencies. In France before 1962, urban renewal tended to destroy those areas in a town considered unhealthy and to build in their place modern living quarters. After 1962, a collaboration between conservation and planning agencies was very effective and the funds allocated to urban renewal. In Egypt, during the nineteenth century, there was no coordination between different

ministries to study the effect of planning on historical monuments; the result was a restoration of isolated monuments. Planning project made no provisions for the conservation of historic environments.

Coordination between a controlling body that deals with conservation and other government organizations (housing, planning and public works) is very crucial in any conservation methodology that aims at the protection and continuity of the historic and cultural heritage. National Registers of any kind are not just listing of historic monuments but can serve as planning tools as well since conservation is considered in all planning activities. Section 106 of the Review Process tackles only Federal undertakings and does not deal with historic monuments on private properties. Coordination between conservation organizations and other governmental bodies such as planning agencies and local authorities were more successful in France (especially after the 1962 integrated conservation law) than in the USA or Egypt. In the USA for example, HUD was one of the last agencies to really coordinate with conservation organizations. Lack of this coordination in Egypt resulted in the restoration of isolated monuments; integrated conservation does not really exist in Egypt yet.

7- Grading

In US, there is no grading of properties (except the National Historic Landmark Program); a property was either on or off the National Register (NR). Emphasis was on the boundary as well as contributing and non-contributing elements in the classification and registration. Historic and cultural resources in France were divided into Classified monuments and Registered monuments. Such a grading system affected the level of intervention in historic buildings. The property was included in a list established for every "department" registration included nature of property, place and address as well as the extent of classification. In Egypt, even though there is no grading system for historic and cultural resources, it is needed because of the variety in the types of these resources, from different periods of history.

The grading system of historic and cultural resources adopted in France since the 1913 regulation (monuments can either be classified or registered) could be a very practical system to categorize historic buildings, structures, objects, and sites. Such a system did not exist in the USA or Egypt. The grading system could be useful when only part of a cultural resource retains integrity or when certain parts possess more significance than other parts or when a resource is not significant enough now but maybe in the future. Grading allows the possibility of different levels of interventions. Grading provides at least some kind of protection instead of no protection at all. Even though there is no grading system of historic monuments, the American system puts much emphasis on boundary determination and identities contributing and non-contributing elements.

8- Dominance

In USA and France, there has been no conflict between archaeology and conservation of historic monuments in USA, both disciplines still go together in the protection of all prehistoric and historic cultural resources. However, in Egypt, the beginning of the conservation movement was in archaeology and Egyptology. It was set up by European orientalist, archaeologists and researchers. The archaeology paradigm still dominates the practice of conservation with emphasis on archaeology. The Department of Antiquities is still working to redefine the word "antiquities" rather than "cultural conservation"

The conflict in Egypt between the archaeology/tourism paradigm and the cultural conservation paradigm. The roots of the conservation movement were deep within settlement archaeology and antiquity protection. This dominated the structure, philosophy and approach to conservation in all of the governmental organizations. The fact that cultural and historical resources dating to the later periods of history (19th and 20th centuries) were receptive to rehabilitation and adaptive use was one of the main differences that separated the archaeology/ tourism paradigm from the cultural conservation paradigm. Such monuments and districts could be reinstated in the daily life of the people through adaptive use and rehabilitation; the ancient monuments of the pharaohs could not. In Egypt, the structure of the Department of Antiquity, its philosophy, directorship and mission are currently organized around settlement archaeology. There is a desperate need for an infrastructure for conservation with local support (conservation to be integrated in the value system of the people) and financial aid. The UNESCO plan indicated the need to create an Egyptian organization to deal with cultural conservation different from the DOA (acknowledging the new paradigm). DOA is presently critically short of

funds and under pressure to spend its conservation budget on those examples of Egypt's cultural heritage (ancient) that bring in the best returns from tourism. Medieval Cairo is still secondary to the unique and world-famous Pharaonic remains.

9- Documentation

In USA, there is an identification and documentation of historic and cultural resources. Executive Order for enhancement and protection the cultural environment in 1971 demanded official agencies to survey all cultural property on land, they administer and consider nominations for the nation register. First inventories were done for historic monuments in France in 1830. Listing and inventory were major steps in the French conservation system. Collaboration and coordination between planning and conservation agencies were implemented in France especially after the 1962 law. Promotion and advocacy were essential parts of the process in France. In Egypt, process stopped at survey, listing and documentation. No clear effects for listing. Adaptive use and rehabilitation rather than mere restoration addressed the problems faced by conservation in the country. The responsibilities of conservationists to seek new uses for old buildings and settings.

A comprehensive, multidimensional, multi methods for the conservation of architectural heritage aims at arriving at a broader definition of architectural heritage with provisions for inventory, evaluation, registration, coordination and advocacy as well as awareness. Inventory, evaluation and registration are considered the first steps in a conservation methodology. The US, France and Egypt currently have provisions for such measures. Registration in the form of national registers serve as planning tools when catering for historic buildings and neighborhoods in planning projects. Protective strategies are important parts of any methodology dealing with conservation. They ensure that interventions in old settings do not compromise historical integrity and character of place. The US currently possesses clear protective strategies (Secretary of the Interiors Standards for Rehabilitation). Promotion, advocacy and public awareness were found to be important to build bridges between government and private efforts. Advocacy includes seeking new uses for old buildings. This responsibility should be shared by both conservationists and government officials working in conservation. Advocacy and awareness become essential in a country like Egypt with many problems in conservation which need public support. Coordination between a central body for conservation and different governmental agencies is an important part of any conservation methodology. In Egypt, the process of conservation was found to stop at survey and registration. Effective legislation alone is not enough to ensure the conservation and protection of the cultural and historical heritage.

10- Identification

Historic preservation emerged in the US during the nineteenth century as an attempt to establish national identity through cultural affiliation to significant buildings, sites, persons and past events. After the founding of the American Republic, the preservation movement began to construct an image of a unified American identity among descendants of British colonists. French architects recognized French National architectural style (French Medieval Gothic) which led to the development of national identity. Interest in the past appeared in historical novels, which tried to foster National identity (Victor Hugo's *Norre Dame de Paris*). In Egypt, most remarkable feature of medieval Cairo was its sheer size (1/2 million inhabitants in the fourteenth centuries). The city became capital of a great Islamic empire of Fatimids. Importance of medieval Islamic architecture to the overall history of the city and the nation.

National identity through cultural affiliation. The relationship between national identity, historic and cultural resources. Historic preservation emerged in the US during the 19th century as an endeavor to found national identity via cultural affiliation with significant buildings, sites, persons and past events. Historic and cultural conservation and its contribution to build a unified national identity. National identity and belonging to the sense of place. The relationship between national identity and the medieval periods in France (French Gothic) and Egypt (medieval Islamic period).

In the continuing search for identity, conservation of historic and cultural monuments could provide common ground for people with different associations and affiliations. Nationalism always develops during the struggle for freedom and independence.

11- Pride

In USA in 1966, section 106 of the review process affected only projects on federal land or funded by federal money. It did not cover private property. Private ownership was cherished in the US and so different from state to state. Hot debates about private ownership and preservation or listing of properties were then ongoing (1994–1995) in Oregon and Washington. In France 1830's, Hugo stated that a monument had 2 aspects, its beauty and its function; the use–value might belong to its owner, but the beauty belonged to the whole world. He suggested that private ownership of ancient monuments be restricted, and public rights recognized. In 1887, the law restricted private ownership in the name of public interest. In 1913, The Law of 1913 facilitated the listing of private and religious monuments using the term "public interest" rather than "national importance". Responsibilities to restore or maintain historic monuments were shared by both the owners and the government. In Egypt, pride among owners of historic buildings.

The existence of a more balanced attitude concerning public interest and private ownership in France. Generally speaking, the US still prioritizes private ownership of historic monuments over public interest. Conflict between preservation and private properties especially in some western states such as Oregon. In France, public rights of historic monuments are still recognized and celebrated. In France, the Law of 1913 facilitated the listing of private and religious monuments by the use of the term "public interest" rather than "national importance".

12- Education

In the US, renewed interest in the study of historic architecture. Effects of movement on academia and vice versa: The importance of preservation graduate programs in generating preservation–minded architects. The movements of multiculturalism and ethnicity in the 1980s contributed to graduating fewer art–oriented architectural historians and more social historians (anthropologists and ethnographers). In France, Early 1800's the Ecole des Beaux–Arts was established which had negative effects on conservation. (Lack of interest in national, traditional architecture, medieval Gothic and adoption of the Neo–Classic approach to architecture). The classical education of former times was replaced with the study of national monuments in the curriculum in 1840's and 1850's. Successful students were then dispatched all over France to take care of ancient buildings. The Beaux–Arts education had a negative effect on the evaluation of monuments as singular entities (points of connection). In Egypt, there is no educational programs for conservation.

The relationship between architectural programs in conservation (conservation education) and the enthusiasm of local architects for conservation. In the US, the movements of multiculturalism and ethnicity in the 1980's contributed to graduating fewer art-oriented architectural historians and more social historians (anthropologists and ethnographers). Pro-conservation education is an important factor in the development of a conscientious society towards its historic and cultural resources. After the civil war in 1990, a program of conservation of heritage properties was established in American university of Beirut.

VI. Conclusion

The article focuses on three countries in various cultural and geographic contexts; US, France, and Egypt. The evolutionary study of these countries was incorporated in the research to help the researcher to deeply understand the mechanism of conservation and how they managed to maintain their heritage appropriately. Analysis of the countries concentrated on the origins of each conservation movement, the progression of pro–conservation laws and regulations, the evolution of the significance concept, the evaluation criteria for significance of architectural heritage, conservation systems and processes, the role of private agencies and individuals in the success of conservation movements, the relationship between cultural heritage and national identity as well as other relevant issues. Through analyzing the results, the researcher found that the key issues influencing the conservation process are Roots, Laws, Significance, Effects, Private Organization, Coordination, Grading, Dominance, Documentation, Identification, Pride, and Education. Generation of inferences in each topic show the harmony and contrast among these countries that can assist the stakeholders to develop the cultural heritage management in their countries.

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