

## **APPENDIX H: COMMENTS AND RESPONSES**

### **Table of Contents**

<b>PUBLIC COMMENT .....</b>	<b>2</b>
<b>TECHNICAL REPORT PEER REVIEW COMMENTS .....</b>	<b>3</b>
<b>RESPONSES TO DRAFT REPORT REVIEW COMMENTS.....</b>	<b>17</b>

## PUBLIC COMMENT

To: Metropolitan Transit Authority

From: Gilbert Hom

Re: Comments on **The Historic Los Angeles Cemetery (HLAC) - Summary Report**

The following are comments on the Report submitted by Cogstone Resource Management Inc. on their archeological work for the MTA Eastside extension of the Gold Line are being submitted by Gilbert Hom, member of the Chinese Historical Society of Southern California (CHSSC), and co Chair of its Archive Committee. They are the comments and recommendations of a lay individual.

On page vii it is recommended that ..."documents, ....records, ...and photographs .... " be deposited at the Fowler Museum of Cultural History.

**MY RECOMMENDATION:** That a duplicate set of documentation be given to the CHSSC to be added to their exiting collection of Chinese American archeological documents. In addition to documents directly obtained from the HLAC Project, documents like the burial records, Golden Gate Park Cemetery documents, and associated electronic data will be useful to users of this collection

On page viii the paragraph that starts by stating that.... "People who were not indigent but of limited financial means...."incorrectly gives the reader of the report the impression that "financial means" and not racism is the primary reason Chinese were buried in the HLAC. During the height of anti-Chinese sentiment in the late 19<sup>th</sup> century, Chinese were restricted from many cemeteries. While these restriction eased somewhat in the early 20<sup>th</sup> century traditional burial rites and funerary practices could be better accommodated in Chinese sections or Chinese cemeteries.

**MY RECOMMENDATION:** Substantial parts of the report need to be researched to more clearly explain the plight of these early Chinese residents. Why anti-Chinese sentiment followed the Chinese literally "to their grave".

**COMMENT:** The report does not explain why it was thought that excavating in a known burial grounds would not impact those buried as well as cultural/historical resources. This is a serious omission. The Report does not comment on mitigation measures taken to insure an acceptable level of impact or whether those measures were successful.

The Chapter on demographics was both poorly analysed with very faulty conclusions. The fact that Chinese were buried at as high as ten times their proportion in the general population for 1890/1900 clearly skewed the other ethnic populations compared, making a faulty conclusion that percentage of Blacks were similar to their percentage in the population. Are the authors of the report showing a bias in not recognizing that racial minorities in late 19<sup>th</sup> century Los Angeles occupied a larger percentage of the indigent population for which this cemetery was for.

**MY RECOMMENDATION:** That the MTA, and its Advisory Boards NOT accept this Report as submitted. That a team with expertise in historical/cultural resources can be consulted to obtain a better assessment of historical/cultural resources were recovered and what remains to be done.

## **HLAC TECHNICAL REPORT: PEER REVIEW COMMENTS**

**Prepared by Applied EarthWorks, Inc.  
for  
Jones & Stokes, Los Angeles  
January 2007**

These are the comments as received. The only alteration was to renumber the comments sequentially for clarity of reference. Chapters referenced here are those of draft report. In Responses chapters are updated to final report organization.

On December 28, 2006 Jones & Stokes contracted with Applied EarthWorks, Inc. on behalf of Metropolitan Transportation Authority (MTA) to conduct a peer review of an archaeological evaluation report of the historic Los Angeles Cemetery (CA-LAN-3553). This draft technical report entitled *The Historic Los Angeles Cemetery (CA-LAN-3553), Los Angeles Metro Gold Line Project, East Portal Area, Los Angeles, CA* was prepared and submitted by Cogstone Resources Management Inc. (Cogstone) in August 2006. The report summarizes the results of extensive archaeological data recovery following the discovery of human remains during construction of the East Portal of the Gold Line at First and Lorena streets. Between June and August 2005 burials were exhumed from this historic cemetery now the location of the Los Angeles County Crematorium. Additional recovery became necessary in April 2006 when trenching was needed to install a utility pipe as part of MTA construction. In all, 119 burials or partial burials were recovered, in addition to two areas of cremated remains (Gust et al. 2006:602).

Prior to beginning construction, the Gold Line Eastside Extension light rail transit project underwent an extensive environmental review process in consultation with the Federal Transportation Administration (FTA) with the State Office of Historic Preservation (OHP) as required by the National Environmental Protection Act and California Environmental Quality Act (NEPA/CEQA). Despite the numerous studies undertaken (MFA 1994; Rasson 1994; Greenwood and Associates 2000, 2001; UltraSystems 2003) regarding cultural resources, the discovery of human remains during the expansion was unanticipated. Upon discovery and confirmation of the presence of intact burials a treatment plan was developed in consultation with the Resident Advisory Committee (RAC) and MTA.

The Historic Los Angeles cemetery report prepared by Cogstone is an impressive compilation of research, field, and laboratory data on the results of the 2005 and 2006 data recovery investigations of the county cemetery site (CA-LAN-3553). The report is well organized, presents a huge amount of data, and makes ample use of photographs, maps, and data tables to summarize the results of this investigation. Overviews of early Los Angeles cemeteries and Chinese death rites demonstrate the extensive amount of research that was conducted for this study. It is also evident that Cogstone personnel made every attempt to obtain historical burial records, registers, historic deeds, and maps of burial plots for this study. It is further clear that efforts were made to accommodate construction needs, and to coordinate with interested parties such as the RAC, the Chinese Historical Society, and MTA staff.

As with any effort of this magnitude, there are aspects of the document where the presentation of data could have been expanded upon, clarified, or researched further. However, it is recognized that there may have been limitations in the scope of work and available funding. With that in mind, *Æ* offers general comments. A table then follows with specific editorial observations and recommendations for possible improvement or clarification. In general, the reviewers resisted offering personal stylistic editorial comments.

### **General Observations:**

1. The glossary of terms provided in Appendix C is very informative; however, a list of acronyms would also be useful and should be presented at the beginning of the report.
2. The use of an acronym identifying the Los Angeles county cemetery and later the Golden Gate cemetery relegates both cemeteries to an impersonal status which may not accurately reflect their historic importance as a spiritual place where the living parted with their newly deceased loved ones. Historically, the county cemetery was deeded as an indigent graveyard and has on occasion been referred to as a pauper cemetery. However, burial plots were sold to private individuals and both elaborate and modest burial ceremonies were performed. Such ritual display conveys a social and spiritual importance beyond the impersonal interment of unnamed and/or unclaimed individuals, such as suicides, murder victims, and medical cadavers. Such a usage, sanctioned by the county and city of Los Angeles, argues for a place in history beyond a mere acronym. Further, the use of acronyms or the designation of LA county cemetery is inconsistently applied.
3. The early descriptive chapters and discussion of methods are very thorough, but should be considered closely for redundancy, clarity, and consistency in formatting.
4. Chapter 7, Subsection 7.3 of the History, focuses too heavily on Chinese death rites. Based on the forensic analysis attained as a result of archaeological excavations, multiple cultures are represented in the individual burials recovered from the former county cemetery. Death rites of other population groups represented in the sample, or a more general discussion of common historic-era burial practices from the 1880s through the 1920s should also be considered.

Perhaps it is at this point that the discussion of the Victorian-era beautification of death movement should be introduced, as it aptly describes the treatment of Anglo-American remains at a time when consumerism was rapidly expanding in all aspects of American life. It should be offered as distinct from traditional Chinese burial practices. While it is true that the Chinese adopted some western burial accoutrements (western clothing and coffin/casket hardware) this was a matter of commodity availability. Historical records and the material culture recovered from the county cemetery make it clear that the Chinese adhered to tradition in performing burials rites in as far as possible.

5. The “recovery” summaries presented in Chapter 8 are a well-organized compilation of archaeological, mortuary, and skeletal data. However, we caution that the term “recovery” used throughout the report may be too analytic and conjures the image of a medical coroner

team and could be construed as dehumanizing. It also conflicts with the legal term “data recovery” employed as part of Section 106 of the National Historic Preservation Act (NHPA). It is suggested that the use of “burial” or “burial feature” (in the cases of partial burials or empty graves) be considered.

6. While the identification of pathological conditions among the skeletal sample is impressive, the report could benefit from more interpretation of the pathological data.
7. Discussion is warranted on the following topics: grave orientation and representation of non-race based groups such as the Independent Order of Odd Fellows and the possible woman-member of this fraternal group. Demographics and economic status could also be explored further. If not possible within funding constraints or restrictions imposed by interested parties, the data potential or data limitations should be clearly stated.
8. Beyond the general site history there is no discussion of the interment of indigents or the county burial of cadavers/medical waste. Was any physical evidence found of indigent burials during excavations? More information on the use of the property as a medical waste facility; and further discussion of autopsy at the turn of the century should be explored.
9. Discussions and identifications of ancestry based on anthroposcopic observations of skeletal traits needs to be revisited in this study. In section 4.7, page 16, it states that the methods employed to determine ancestry is described by Rhine (1990), yet the racial categories used in this study (Euro-American, Asian, and Mixed [a combination of Euro-American and Asian traits, which includes Hispanics]), are not the categories used by Rhine (1990), nor do they include Native Americans and Black Americans. Rhine’s categories are Caucasoids (Anglos and Hispanics), Mongoloid (Asian and Native American), and American Blacks

Further, ancestry should always be evaluated against numerous racial indicators, rather than a single attribute (Rhine 1990:18). Some traits are present in all populations to some degree (i.e., Inion hook, Wormian bones, Carabelli’s cups), but in different frequencies, which is one of the reasons why multiple skeletal indicators should be used for determinations of race. Throughout Chapter 8 ancestry was based on a single racial indicator in a number of instances. Also, many of the individuals were determined to be Asian based on the presence of shovel shaped incisors; however, this trait is also common in Native Americans.

Summaries and interpretations based on racial classifications of the skeletal sample should be revised accordingly. Ethnic identifiers, such as many of the Chinese cultural items found with the remains, may serve to support racial classifications in this study; however, in the absence of supporting evidence, racial classification (ancestry) based on a single or a few traits should be avoided.

## **Specific Concerns**

### **Executive Summary**

10. In the Executive Summary, the list of laws and regulations cited includes NAGPRA; however, NAGPRA does not apply unless Native American human remains were encountered and the Project is on federal land or an Indian Reservation. No Native American remains or objects of patrimony are described.
11. The Executive Summary states that “as of the date of this draft report, it has not yet been determined if artifacts will be reinterred, curated or a combination of thereof” (pg.3). For the final draft of the report, decisions regarding the artifacts disposition will need to be included, and the curation agreement should be in place. An accession number should also be listed in the report and a description of the collection to be curated or replication of artifacts to be reinterred should be provided.
12. Page 3 mentions that “All human remains recovered are scheduled to be reinterred by Metro following the recommendations of the RAC advisory subcommittee.” A summary of the recommendations would be appropriate or perhaps should be included as an Appendix. Also, decisions regarding the reinterment of human remains need to be included in the final document.

### **Chapter 1: Introduction**

13. A thorough history of the project and what steps were taken to comply with NEPA, CEQA, and NHPA (Section 106) should be presented as part of the report **Introduction**. This should include a discussion of what steps were put into place to deal with unanticipated discoveries (making reference to the stipulations of the MOA appended to the SEIS/SEIR, the preparation of a mitigation monitoring plan, development of a project research design, and RAC and Gust’s treatment plans).
14. Discuss, briefly, the historic property designation for Evergreen Cemetery which includes the county crematorium building. The SHPO concurred with the eligibility of this property and the boundaries that included the Crematorium property.

### **Chapter 2: Field Methods**

15. In the **Introduction** (2.1, pg.1), the caption for the figure is not in agreement with the text that describes it. The caption is listed as “Distribution of Recovered Materials” but the text indicates that the figure depicts four project areas that were defined based on “the work that occurred.” It also states that the Project area was divided into “segments” yet they are labeled as “Area A, Area B, etc.” The text and/or figures should be modified to reflect parallel structure.
16. In the description of the 2005 data recovery methods (pg. 4), the text states that the machinery removed fill soils to sterile. Clarify how this transition was determined. Were sediments screened or was native (undisturbed) soil identified based on a visual inspection of the sediments?

17. Figure on page 4 depicts human bone. Was this approved by the RAC or other interested parties? Perhaps this should be stated in a footnote.
18. In Chapter 2 screening methods are not clearly described. In the discussion of the 2005 investigations on page 5, second paragraph, it states that “sometimes a ¼” dry screen was used to recover bone fragments.” Explain why only some sediments were screened for bone? On page 8, it states that “a 1/8” dry screen was used to recover fragments;” state why methods change from one year to the next.

### **Chapter 3: Artifact Laboratory Methods**

19. On page 12 a distinction is made between mortuary and cultural artifact categorization, and the mortuary class has been added to Table 3.1 as a distinct functional group. All grave good offering are then classified according to functional classes and combined in the larger data-base with intrusive items collected from the site. This is not clearly explained in the discussion provided in the text. Grave good offerings have a distinctive role in further site analysis and this needs to be fully explained in the laboratory methods. For example, how were grave goods then sorted from intrusive items in manipulating the data-base?
20. Certain aspects of the material analysis need further clarification. For example, expanding the discussion of how and why the group/functional class/and item description are used to organize and interpret the material analysis would contribute greatly to presentation of the analysis under **Overview of Artifacts [Attained] From Recovery** in Chapter 8.
21. The source used for identifying and the terminology used in describing buttons should be added.
22. Certain classes seem misplaced on *Table 3.1: LACC Artifact Catalog Categories*. For example, faunal remains are placed under Activities. This class seems better grouped under Domestic with other food consumption/storage items. The same can be said of alcohol bottles. While drug paraphernalia may be a personal possession, wine in many cultures is just part of dinner.
23. Cremains are listed under the Mortuary category on Table 3.1. The term “cremains” is jargonistic and should be replaced with cremated remains. Further, other human remains are not discussed in this section which is focused on material culture. Cremated remains should be included in the discussion of osteology laboratory methods not the material culture analysis section.
24. If samples are available, wood identification of the coffins/caskets can provide economic status data.
25. Also on page 12, under type specific processing, certain metal, ceramic, glass and miscellaneous artifacts were discarded. The archaeological treatment plan for the Project does not include provisions for discarding artifacts. Further, until consultation with the descendants or interested parties has been completed and a reburial agreement has been

drafted and signed, no burial-related materials should have been discarded. This approach needs further explanation and justification.

#### **Chapter 4: Osteological Laboratory Methods**

26. Some of the methods used for measurements (Section 4.4, p.15) are not consistent with *Standards for Data Collection from Human Skeletal Remains (Standards)* by Buikstra and Ubelaker (1994). Measurements for long bone lengths should have been taken with an osteometric board, not a sliding caliper. Unless proper measuring devices were used for long bone lengths, stature estimates derived for this study should be excluded. Further, the text in Section 4.4 indicates that “measurements were taken from the left side, in their absence, the right side was used.” Measurements should have been taken from both sides. Differences in the dimensions of a left and right long bone can infer differential use of that limb (Larsen 1997:221).
27. Section 4.5 (pg. 15) lists the ageing methods used in the analyses and cites the appropriate sources; however, some of the sources listed need to specify which method was used. For instance, Buikstra and Ubelaker (1994) present different scoring methods for pubic symphysis faces: Todd (1921a, 1921b) and Suchey-Brooks (Brooks and Suchey 1990; Suchey and Katz 1986). Specify which primary source and method was used.

Why was dental attrition not used as an age indicator? Dental attrition can be a fairly reliable age indicator (see *Standards*) and can be used in combination with other ageing methods to help strengthen estimates. Although it is not listed as a method, it is referenced later in the document as an age indicator in some cases (i.e., Recovery 15E, pg. 101) but not in others (i.e. Recovery 1E, pg. 55 and 56).

#### **Chapter 6: Collections**

28. The final draft must include the names of the repositories that will be receiving the collections. If the decision has not been made at the time the report is finalized and that choice lies with the Agency or the advisory committee (RAC), this should be stated for the record and an explanation of how and when the decision is to be made should be provided.

#### **Chapter 7: History**

29. The Historic Los Angeles Cemetery is described as an indigent cemetery with a Chinese component, yet this chapter focuses heavily on the Chinese component (see Section 7.3) with little to no historical background on the other populations represented in this cemetery. This section could benefit from a broader background on indigent cemeteries and a review of historical burial rites that broad-brush other representative groups in the cemetery.
30. Throughout the fourth paragraph on page 29, and the last sentence on page 34, the devil is referenced. Use appropriate terms such as malevolent spirits or angry spirit ghosts as they are cited in the original sources (see Chung and Wegars 2005). Reference to the “devil” in newspaper articles are decidedly Anglo-centric and do not reflect the Chinese cultural perspective. When using this term as a quote, it should be so noted.

31. Between pages 31 and 38 multiple citations in the form of lengthy quotes from Los Angeles newspapers on Chinese death rituals are provided. While the deceased name, the source, and the date of the article is indicated in parentheses at the end of the quote, it is not immediately clear that this is the information being offered. To break up this text, it is recommended that the deceased name be provided as a subheading with the reference following. For example:

**Ah Yet Kee deceased (*Los Angeles Daily Star*, August 8, 1877).**

with the text to follow.

32. At the end of this discussion provide a concluding paragraph stating what all of this has to do with the county cemetery.

### **Chapter 8: Recoveries**

33. Include the Minimum Number of Individuals (MNI) in the summary paragraphs in Section 8.1, page 44.
34. The subheading Other Inclusions or Offerings under Recoveries descriptions frequently does not indicate the context within which the artifacts were found. Were they recovered from in situ or in fill surrounding the burial?
35. There are inconsistencies between data on the maps (i.e. Figure 8.2, 8.3, and 8.4) and summaries of the recoveries. For instance, the Figure 8.2 depicts Recovery 1E as an empty coffin yet Table 8.1 and the summary on p. 55 indicate that skeletal remains were present. This is also true for 14E, 24E, and 54E. Recovery 52E is depicted on the map as “Human Remains (No Coffin)” yet the text on page 55 describe the remnants of a coffin. These inconsistencies were observed throughout the document and a close comparison of text and figures is required.
36. The line spacing and formatting throughout this chapter are inconsistent.
37. Methods used to determine age, race and sex are sometimes vague. For instance, in the Summary for 15E, page 101, it states that “the sex of the individual was determined to be female based on cranial morphology.” To be consistent with the rest of the document, the specific attributes used to determine sex, in this case, should be listed. See also 17E, 19E, 23E, 27E, 42E (ancestry), and 27E, 30E, 31E, 33E, 35E, 44E (sex), and elsewhere in the document. Further, when providing estimates for age, sex and race, multi-factorial methods should be always be used (Bass 1995).
38. Several individuals (Recoveries 51E, 52E, and 53 E) were partially removed. Will the skeletal remains that were removed be reinterred with the remains that were left in place? The partial removal of the remains in three cases could offend the descendants of the deceased (if any are identified). Perhaps these three cases warrant further consideration with regard to the reburial of excavated remains.
39. The presence of a single tooth does not imply that a second individual was present in Recovery 96B (pg. 331).

## **Chapter 9: Grave Things: Cemetery Material Culture**

40. “Grave Things” seems jargonistic and a little disrespectful. Consider changing the title of this section to **Grave Offerings: Mortuary Material Culture**.
41. On page 584, final paragraph, it is stated that the metal lids observed among several of the Chinese burials may have protected the living from the spirits of the dead, yet in the recovery summaries in Chapter 8, it is suggested that the lids may have been used to prevent further dissemination of communicable diseases. Clarify, be consistent, and cite sources.

## **Chapter 10: Here Lies: The People of the Cemetery**

42. Determining average life expectancy of the individuals based on skeletal age estimation is problematic because the age of approximately 78 individuals (according to Figure 10.6) were classified as Adult (non-specific) or Indeterminate. Therefore, a statistically viable average of life expectancy based on such broad categories is not possible. Also, Table 10.6 includes an “Indeterminate” category (approximately 20 individuals); however, this category is not listed in Table 10.1 on the next page (pg. 603).
43. The number of infants in the sample is surprisingly low and atypical for a late nineteenth/early twentieth century cemetery population. Also, there are no Old Adults in the sample, which is also unusual, especially when compared to the burial registers and age-at-death tables in Chapter 10. Further discussion of such discrepancies is necessary.
44. The term “bioarchaeology” (p. 604) is misused here. Bioarchaeology is defined as the use of a range of biological techniques on archaeological material in order to learn more about past populations, which includes the study of disease and trauma. The subject heading should be more specific to the content of this section, which is a review of pathological conditions observed in the sample.
45. This section includes a good overview of the pathological conditions that were observed in the sample; however, the pathological conditions described in this section represent both specific and non-specific indicators of nutritional stress, diet, disease, trauma, and habitual activities. There is little to no interpretation of data presented in the section. Individuals with various pathological conditions should be discussed on a case-by-case basis to better understand types of diseases and nutritional deficiencies that these individuals were experiencing. This section could benefit from a discussion of the diseases and other conditions that were common among indigents during this time. Also, burial registers (Chapter 10: Cause and Age at Death) indicate that lung disease and tuberculosis were among the major causes of death; therefore, a discussion on the possible skeletal indicators of these diseases should be provided.

## **Chapter 11: Comparisons**

46. The comparisons to the two other cemeteries (San Francisco and Virginiatown) are very informative and provide interest reading.

## Chapter 12: Conclusions

47. This section is succinct and provides an excellent summary of the findings from this extensive body of work. A statement discussing the reburial of human remains and curation of artifacts should be included in this section.

**Table 1: Specific Comments**

#	Page	Section	Comment	Recommendations
48	Viii	Table of Contents	Appendices, Tables, and Figures missing	List these items in Table of Contents
49	4	Executive Summary	53 graves lacked bone due to .... A number starting a sentence should be spelled out.	Revise
50	9	Introduction	The last sentence of the first paragraph states that resumes of key personnel can be viewed on the website; however, several of the contributing authors' resumes are no longer available.	Include resumes of key analytic personnel in an Appendix
51	1	Field Methods	Incorrect page number and paragraph formatting issues. Mis-numbered pages begin with page 12.	Check formatting
52	3	Field Methods	Section 2.3 is titled "Field Research" but is limited to a discussion of geophysical studies.	Revise subtitle to reflect the discussion in this subsection
53	3	Field Methods	Change "ground truthing" to "ground penetrating radar" or "remote sensing"	Consider comment
54	5	Field Methods	Second sentence of second paragraph: "... bone and artifacts strewn within the bucket's sweep."	This wording could offend; revise sentence
55	6	Field Methods	The second paragraph regarding recovery numbers is confusing.	Clarify or omit
56	6	Field Methods	The phrase "driven through the base of the coffin" in the first sentence seems harsh.	Consider rephrasing
57	8	Field Methods	Screening of stockpiles: were all stockpiles screened or were stockpiles sampled?	Clarify
58	12	Artifact Laboratory Methods	Under "Type Specific Processing," second paragraph: "Most unidentifiable and non-diagnostic fragments were identified..." This is a contradictory statement.	Clarify
59	12	Artifact Laboratory Methods	Under <u>Ceramics</u> subheading it is noted that Euro-American and Chinese stoneware and porcelains were recovered. Most Euro-American ceramics from the 19 <sup>th</sup> /20 <sup>th</sup> century are going to be earthenwares.	Confirm and revise.
60	16	Osteology Laboratory Methods	Section 4.9, third sentence: the word "evolved" should be changed to "involved."	Revise
61	21	History	Figure 7.2 should include Brooklyn Street on the map as it is discussed in the text.	Revise

#	Page	Section	Comment	Recommendations
62	22	History	“The Chinese cemetery apparently did not have an American name:”	Replace American with official name.
63	23	History	The structures, a memorial shrine and twin burners ...are located at about the <i>center of the original length of the cemetery</i> . The latter phase is unclear.	Revise
64	23	History	The genesis of construction appears to have been a mishap during the Hungry Ghost Festival in 1888. This sentence is unclear.	Clarify
65	26-27	History	“By 1949, a complex of structures was located at HLAC (Figure 7.4).” The caption for Figure 7.4 indicates this is the 1949 Sanborn map. It is the 1928 Sanborn map.	Revise
66	26	History	The sentence “County documents introduce a mythology that the County purchased an already established cemetery “citing Barr 1955. Recommend rephrasing this to “A letter from the Superintendent to the Board of Supervisors erroneously stated ....	Consider comment.
67	29	History	The third paragraph starts with: “Chinese religions (3 major)....” List the three religions: Confucianism, Daoism, and Buddhism.	Consider comment.
68	32	History	In the fourth paragraph, second sentence (They-the biscuits, not the plates...there was not a suspicion of a crust on any of the _____.)” The last part of the sentence is missing	Revise
69	45	Recoveries	Table 8.1: include “Sex” as a category in Summary Table	Consider comment.
70	48	Recoveries	The phrase “ <i>more interesting</i> artifacts are discussed in detail elsewhere” is judgmental.	Revise.
71	55-524	Recoveries	Beginning on Page 55, in Osteological Attributes, a figure is referenced as Figure with no Figure number, yet the referenced figure is labeled as Figure 8.4. This error occurs throughout the recovery section in Chapter 8.	Include appropriate Figure number in the text throughout the Recoveries section
72	56-524	Recoveries	On page 56, in the Osteological Summary, it states that the individual is represented by dentition and a few various long bone fragments yet the Figure 8.4 suggests that complete arm bones (ulnae and radius) were present. The elements should be filled in to accurately represent what was recovered. This occurs throughout the Recoveries section.	Cross check text with table/illustrations.

#	Page	Section	Comment	Recommendations
73	61, 70, 73	Recoveries	It is not clear that there are two burials in the overall summary of Mortuary Attributes. It is not clear where Recovery 3Ea was relative to 3Eb. This is also true for 6E, 7E, 9E, 30E. Also, in some cases the Mortuary Attributes section appears to be combined for both individuals so it is not always clear which artifacts (clothing, personal items, offerings) were associated with individual A and which were associated with individual B (i.e. 3E, 7E).	Clarify
74	64	Recoveries	The Inventory and Preservation section lists fragmented cranial vault and limb bones, yet <i>os coxae</i> are described in the Age category.	Revise
75	67, 92, 226, 312, 499, 520	Recoveries	Long lists of measurements of enamel hypoplasias relative to the CEJ such as this one could be summarized in a table.	Consider comment
76	70	Recoveries	Missing figure for 6Eb.	Include figure for 6Eb
77	104	Recoveries	The sentence “An assemblage of grave goods found during recovery led us to consider that this area might have a different demographic... This is an improper use of “demographic”	Revise.
78	114	Recoveries	For 19E, it states that a steak bone was found beside the left humerus, while the next section states that it resulted from near surface trash being displaced by heavy equipment. The association of this item with the burial warrants further clarification.	Clarify
79	118	Recoveries	Age estimates were determined by the phase of the auricular surface of the <i>os coxa</i> . Provide an age range to be consistent with the rest of the document.	Consider comment
80	124, 128, 131, 134, 155	Recoveries	The presence of osteoarthritis should not be used as a primary criterion for age determination. Osteoarthritis can occur as early as age 20 (Stewart 1958). Either provide justification for the age estimate of >40 or change age category to “adult.”	Revise
81	127	Recoveries	Dentition missing from the Skeletal Summary of 23E.	Consider comment
82	152	Recoveries	The individual recovered from 31E was determined to be female based on cranial morphology but was determined to be between the ages of 12 and 21. Most researchers in following Bass (1995) would argue that subadults and adolescents cannot be accurately sexed.	Consider comment
83	189	Recoveries	In the last sentence, the glenoid cavity of the humerus should be changed to glenoid	Revise.

#	Page	Section	Comment	Recommendations
			cavity of the scapula.	
84	235	Recoveries	Under subheading <b>Other Inclusions or Offerings</b> coins are not listed in chronological order. Is there significance to the order in which they are listed?	Consider comment.
85	259	Recoveries	Be consistent with age categories outlined in the Osteological Methods section of the report. For instance, in this section (Recovery 68E), “juvenile” should be “subadult” and “young teenager” should be “adolescent.”	Revise.
86	533	Recoveries	Sentence starts with Brick markers. This should be Brick burial markers.	Revise.
87	486	Recoveries	In the “Coffin Size and Shape” category, it states: “the burial was left in the wall, hindering an accurate determination of shape and size. Change “hindering” to a less-offensive word such as “limiting.”	Wording may be considered offensive; revise.
88	528	Recoveries	CR 1, the use of the term “mass of ashes” could be offensive. Also, provide a discussion of context. At what depth were the remains found, were they interred in a pit? What was the size of the pit?	Revise and provide additional information.
89	541	Recoveries	7-Up green is not an analytic term.	Consider comment.
90	554	Grave Things	“The movement was adopted by Victorians.” There was a philosophical movement which was based in Victorian principals, to which many adhered, but these individuals were not referred to as Victorians.	Revise.
91	606, 620	Here Lies the People of the Cemetery	Stature estimates and the discussion on stature should be excluded because an osteometric board was not used for measurement of long bones.	Consider comment.
92	614	Here Lies the People of the Cemetery; Comparisons	Table 10.13 (p. 614) is titled “Causes of Death in the Sample” but lists causes of death from the burial records, not the skeletal sample. This is also the case for Figure 10.9.	Consider comment

## References Cited

Bass, William M.

2005 *Human Osteology: A Laboratory and Field Manual*. 5<sup>th</sup> edition.

Buikstra, Jane E. and Douglas H. Ubelaker

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## RESPONSES TO DRAFT REPORT REVIEW COMMENTS \*\*IN ORDER BY CHAPTER

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
GH	1	Chapter 0, Executive Summary	It is recommended that documents, photographs, records, etc. be deposited at the Fowler Museum of Cultural History.	A duplicate set of documentation be given to the CHSSC to be added to their existing collection of Chinese American archaeological documents. In addition to documents directly obtained from the HLAC Project, documents like burial records, Golden Gate Park Cemetery documents, and associated electronic data will be useful to users of this collection.	Metro agreed long ago to provide the CHSSC with all artifact photos, a copy of the catalog and all the ancillary information such as the Golden Gate Cemetery archaeological report. No recommendation was necessary for this.
GH	2	Chapter 0, Executive Summary	“People who were not indigent but of limited financial means...” incorrectly gives the impression that financial means and not racism is the primary reason Chinese were buried in the HLAC. During the height of anti-Chinese sentiment in the late 19 <sup>th</sup> century, Chinese were restricted from many cemeteries. While these restrictions eased somewhat in the early 20 <sup>th</sup> century, traditional burial rites and funerary practices could be better accommodated in Chinese sections or Chinese cemeteries.	Substantial parts of the report need to be researched to more clearly explain the plight of these early Chinese residents. Why anti-Chinese sentiment followed the Chinese literally to their graves.	That line has been revised. The body of the report acknowledges that racism and racist laws were the reason Chinese were buried in sections of indigent cemeteries. There are many excellent studies and papers on anti-Chinese discrimination in California. This report is limited to reporting on the cemetery history research and archaeological results.
AE	10	Chapter 0, Executive Summary	In the Executive Summary, the list of laws and regulations cited includes NAGPRA; however, NAGPRA does not apply unless Native American human remains were encountered and the Project is on federal land or an Indian Reservation. No Native American remains or objects of patrimony are described.		The section in the report summarized in the Exec. Summary mentions the laws that apply to the project which NAGPRA does since the project is federal.

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	11	Chapter 0, Executive Summary	The Executive Summary states that “as of the date of this draft report, it has not yet been determined if artifacts will be reinterred, curated or a combination of thereof” (pg.3). For the final draft of the report, decisions regarding the artifacts disposition will need to be included, and the curation agreement should be in place. An accession number should also be listed in the report and a description of the collection to be curated or replication of artifacts to be reinterred should be provided.		All materials from the cemetery will be reinterred. Documents from the project will be curated at the Fowler Museum at UCLA.
AE	12	Chapter 0, Executive Summary	Page 3 mentions that “All human remains recovered are scheduled to be reinterred by Metro following the recommendations of the RAC advisory subcommittee.” A summary of the recommendations would be appropriate or perhaps should be included as an Appendix. Also, decisions regarding the reinterment of human remains need to be included in the final document.		There are no written minutes of the Resident Advisory Committee meetings or Ad Hoc Subcommittee meetings. Since the Final Report is being issued before the decisions are final, we have included an appendix where that information can be added.
AE	50	Chapter 0, Executive Summary	53 graves lacked bone due to .... A number starting a sentence should be spelled out.	Revise	Revised
AE	49	Chapter 0, Table of Contents	Appendices, Tables, and Figures missing	List these items in Table of Contents	Revised
GH	3	Chapter 1, Introduction	The report does not explain why it was thought that excavating in a known burial grounds would not impact those buried as well a cultural/historical resources. This is a serious omission. The report does not comment on mitigation measures taken to insure an acceptable level of impact or whether those measures were successful.		Metro has indicated that the environmental studies prepared for the site indicated little likelihood of encountering burials. An investigation of those circumstances was ordered by the Metro Board of Directors. An outside consultant was engaged to perform that work. We understand that report will be public once presented to the Board. Mitigation monitoring for potential resources led to discovery of the cemetery, a treatment plan was prepared and data recovery performed. The mitigation plan was followed and successful.

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	13	Chapter 1, Introduction	A thorough history of the project and what steps were taken to comply with NEPA, CEQA, and NHPA (Section 106) should be presented as part of the report <b>Introduction</b> . This should include a discussion of what steps were put into place to deal with unanticipated discoveries (making reference to the stipulations of the MOA appended to the SEIS/SEIR, the preparation of a mitigation monitoring plan, development of a project research design, and RAC and Gust's treatment plans).		Our report on the Eastside project details the general project including the mitigation plan. This report only covers the cemetery data recovery process.
AE	14	Chapter 1, Introduction	Discuss, briefly, the historic property designation for Evergreen Cemetery which includes the county crematorium building. The SHPO concurred with the eligibility of this property and the boundaries that included the Crematorium property.		We have filed an update to the original incorrect site record for Evergreen. It is not reasonable to expect SHPO would know the record was incorrect.
AE	51	Chapter 1, Introduction	The last sentence of the first paragraph states that resumes of key personnel can be viewed on the website; however, several of the contributing authors' resumes are no longer available.	Include resumes of key analytic personnel in an Appendix	All personnel qualifications are listed in Appendix A.
AE	29	Chapter 1, Introduction, Collections	The final draft must include the names of the repositories that will be receiving the collections. If the decision has not been made at the time the report is finalized and that choice lies with the Agency or the advisory committee (RAC), this should be stated for the record and an explanation of how and when the decision is to be made should be provided.		See response to comment 11.

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	19	Chapter 2, Methods, Artifact	On page 12 a distinction is made between mortuary and cultural artifact categorization, and the mortuary class has been added to Table 3.1 as a distinct functional group. All grave good offering are then classified according to functional classes and combined in the larger data-base with intrusive items collected from the site. This is not clearly explained in the discussion provided in the text. Grave good offerings have a distinctive role in further site analysis and this needs to be fully explained in the laboratory methods. For example, how were grave goods then sorted from intrusive items in manipulating the data-base?		The methods have been revised to clarify but simply, the intrusive items are those that post-date the cemetery.
AE	20	Chapter 2, Methods, Artifact	Certain aspects of the material analysis need further clarification. For example, expanding the discussion of how and why the group/functional class/and item description are used to organize and interpret the material analysis would contribute greatly to presentation of the analysis under <b>Overview of Artifacts [Attained] From Recovery</b> in Chapter 8.		Revised to clarify. In short, the functional categories are based on or taken directly from those used by Sonoma State University. These have a long history of utility and are specific to California sites.
AE	21	Chapter 2, Methods, Artifact	The source used for identifying and the terminology used in describing buttons should be added.		Revised
AE	22	Chapter 2, Methods, Artifact	Certain classes seem misplaced on <i>Table 3.1: LACC Artifact Catalog Categories</i> . For example, faunal remains are placed under Activities. This class seems better grouped under Domestic with other food consumption/storage items. The same can be said of alcohol bottles. While drug paraphernalia may be a personal possession, wine in many cultures is just part of dinner.		Faunal remains were moved to Domestic. Alcohol stays where classified. The entire catalog is provided so other analysts are free to use their own systems.

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	23	Chapter 2, Methods, Artifact	Cremains are listed under the Mortuary category on Table 3.1. The term “cremains” is jargonistic and should be replaced with cremated remains. Further, other human remains are not discussed in this section which is focused on material culture. Cremated remains should be included in the discussion of osteology laboratory methods not the material culture analysis section.		Revised and limited to “jars and other storage for cremated human remains”.
AE	24	Chapter 2, Methods, Artifact	If samples are available, wood identification of the coffins/caskets can provide economic status data.		Most wood consisted of decomposing fragments and all appeared to be redwood.
AE	25	Chapter 2, Methods, Artifact	Also on page 12, under type specific processing, certain metal, ceramic, glass and miscellaneous artifacts were discarded. The archaeological treatment plan for the Project does not include provisions for discarding artifacts. Further, until consultation with the descendants or interested parties has been completed and a reburial agreement has been drafted and signed, no burial-related materials should have been discarded. This approach needs further explanation and justification.		We discarded unidentifiable shards commonly discarded in historical archaeology. Both the osteo and artifact labs had many buckets of dirt from the project after cleaning was completed. We discarded into that dirt which was returned to the project site.
AE	59	Chapter 2, Methods, Artifact	Under “Type Specific Processing,” second paragraph: “Most unidentifiable and non-diagnostic fragments were identified...” This is a contradictory statement.		The author meant to say that fragments were determined to be unid and non-diagnostic. Revised.
AE	60	Chapter 2, Methods, Artifact	Under <u>Ceramics</u> subheading it is noted that Euro-American and Chinese stoneware and porcelains were recovered. Most Euro-American ceramics from the 19 <sup>th</sup> /20 <sup>th</sup> century are going to be earthenwares.		We know what the common case is. The report states the correct facts.

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	15	Chapter 2, Field Methods	In the <b>Introduction</b> (2.1, pg.1), the caption for the figure is not in agreement with the text that describes it. The caption is listed as “Distribution of Recovered Materials” but the text indicates that the figure depicts four project areas that were defined based on “the work that occurred.” It also states that the Project area was divided into “segments” yet they are labeled as “Area A, Area B, etc.” The text and/or figures should be modified to reflect parallel structure.		The figure does reflect the outline distribution of recovered materials in each of the areas of work; otherwise they would be rectangles. We used the word segment since talking about areas of the project area seemed much more confusing.
AE	16	Chapter 2, Methods, Field	In the description of the 2005 data recovery methods (pg. 4), the text states that the machinery removed fill soils to sterile. Clarify how this transition was determined. Were sediments screened or was native (undisturbed) soil identified based on a visual inspection of the sediments?		Yes – by visual inspection. Revised to clarify.
AE	17	Chapter 2, Methods, Field	Figure on page 4 depicts human bone. Was this approved by the RAC or other interested parties? Perhaps this should be stated in a footnote.		The project archaeologist determines appropriate content of the report.
AE	18	Chapter 2, Methods, Field	In Chapter 2 screening methods are not clearly described. In the discussion of the 2005 investigations on page 5, second paragraph, it states that “sometimes a ¼” dry screen was used to recover bone fragments.” Explain why only some sediments were screened for bone? On page 8, it states that “a 1/8” dry screen was used to recover fragments;” state why methods change from one year to the next.		Backdirt from the first day of earthmoving was broken up by hand to retrieve bone. We tested screening the sediments and it did not work. Hand-troweled (scraped) sediments were sometimes screened during data recovery if consistency was appropriate and bone fragments were observed in the dirt.
AE	52	Chapter 2, Methods, Field	Incorrect page number and paragraph formatting issues. Mis-numbered pages begin with page 12.	Check formatting	Revised
AE	53	Chapter 2, Methods, Field	Section 2.3 is titled “Field Research” but is limited to a discussion of geophysical studies.	Revise subtitle to reflect the discussion in this subsection	The geophysical studies were the field research performed. Unchanged.
AE	54	Chapter 2, Methods, Field	Change “ground truthing” to “ground penetrating radar” or “remote sensing”	Consider comment	Revised
AE	55	Chapter 2, Methods, Field	Second sentence of second paragraph: “... bone and artifacts strewn within the bucket’s sweep.”	This wording could offend; revise sentence	Revised
AE	56	Chapter 2, Methods, Field	The second paragraph regarding recovery numbers is confusing.	Clarify or omit	Revised

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	57	Chapter 2, Methods, Field	The phase “driven through the base of the coffin” <u>in the first sentence seems harsh.</u>	Consider rephrasing	Changed to “a shovel test pit was dug through the base of the coffin”.
AE	58	Chapter 2, Methods, Field	Screening of stockpiles: were all stockpiles screened or were stockpiles sampled?	Clarify	See response to comment 18: Revised

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	9	Chapter 2, Osteology Methods	<p>Discussions and identifications of ancestry based on anthroposcopic observations of skeletal traits needs to be revisited in this study. In section 4.7, page 16, it states that the methods employed to determine ancestry is described by Rhine (1990), yet the racial categories used in this study (Euro-American, Asian, and Mixed [a combination of Euro-American and Asian traits, which includes Hispanics]), are not the categories used by Rhine (1990), nor do they include Native Americans and Black Americans. Rhine's categories are Caucasoids (Anglos and Hispanics), Mongoloid (Asian and Native American), and American Blacks</p> <p>Further, ancestry should always be evaluated against numerous racial indicators, rather than a single attribute (Rhine 1990:18). Some traits are present in all populations to some degree (i.e., Inion hook, Wormian bones, Carabelli's cups), but in different frequencies, which is one of the reasons why multiple skeletal indicators should be used for determinations of race. Throughout Chapter 8 ancestry was based on a single racial indicator in a number of instances. Also, many of the individuals were determined to be Asian based on the presence of shovel shaped incisors; however, this trait is also common in Native Americans.</p> <p>Summaries and interpretations based on racial classifications of the skeletal sample should be revised accordingly. Ethnic identifiers, such as many of the Chinese cultural items found with the remains, may serve to support racial classifications in this study; however, in the absence of supporting evidence, racial classification (ancestry) based on a single or a few traits should be avoided.</p>		<p>It is current professional practice to restrict skeletal material (biological matter) to ancestry determinations (biological categories) rather than using cultural constructs such as race. We did not clarify sufficiently and that has been revised.</p> <p>Using ancestry categories in replacement of racial classifications does not warrant revisions in summaries and interpretations. Skeletons determined to be of a specific ancestry do not imply that they are solely of that ancestry or would have appeared in life as someone racially classified as that ancestry.</p> <p>Multiple indicators of ancestry were used whenever possible. The condition of the skeletal material from this site often means we have only one trait to work with. Single indicators of ancestry do not justify an indeterminate classification.</p> <p>We have detailed the traits in the osteo catalog and other osteologists are free to make their own determinations.</p>

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	26	Chapter 2, Methods, Osteology	Some of the methods used for measurements (Section 4.4, p.15) are not consistent with <i>Standards for Data Collection from Human Skeletal Remains (Standards)</i> by Buikstra and Ubelaker (1994). Measurements for long bone lengths should have been taken with an osteometric board, not a sliding caliper. Unless proper measuring devices were used for long bone lengths, stature estimates derived for this study should be excluded. Further, the text in Section 4.4 indicates that “measurements were taken from the left side, in their absence, the right side was used.” Measurements should have been taken from both sides. Differences in the dimensions of a left and right long bone can infer differential use of that limb (Larsen 1997:221).		Use of updated electronic tools does not invalidate the results. The meter long calipers have wide jaws more than sufficient to mimic an osteometric board.  According to <i>Standards</i> , “in the case of bilateral measurements, take measurements on the left side” (Attachment 21). No revisions necessary.
AE	27	Chapter 2, Methods, Osteology	Section 4.5 (pg. 15) lists the ageing methods used in the analyses and cites the appropriate sources; however, some of the sources listed need to specify which method was used. For instance, Buikstra and Ubelaker (1994) present different scoring methods for pubic symphysis faces: Todd (1921a, 1921b) and Suchey-Brooks (Brooks and Suchey 1990; Suchey and Katz 1986). Specify which primary source and method was used.		Revised to clarify.
AE	28	Chapter 2, Methods, Osteology	Why was dental attrition not used as an age indicator? Dental attrition can be a fairly reliable age indicator (see <i>Standards</i> ) and can be used in combination with other ageing methods to help strengthen estimates. Although it is not listed as a method, it is referenced later in the document as an age indicator in some cases (i.e., Recovery 15E, pg. 101) but not in others (i.e. Recovery 1E, pg. 55 and 56).		We did not have an unlimited budget nor full sets of dentition to work with. Dental attrition was used to strengthen age estimates when appropriate. Dental attrition methods are added to the age methodology.
AE	61	Chapter 2, Methods, Osteology	Section 4.9, third sentence: the word “evolved” should be changed to “involved.”	Revise	Revised

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	5	Chapter 3, Results	The “recovery” summaries presented in Chapter 8 are a well-organized compilation of archaeological, mortuary, and skeletal data. However, we caution that the term “recovery” used throughout the report may be too analytic and conjures the image of a medical coroner team and could be construed as dehumanizing. It also conflicts with the legal term “data recovery” employed as part of Section 106 of the National Historic Preservation Act (NHPA). It is suggested that the use of “burial” or “burial feature” (in the cases of partial burials or empty graves) be considered.		We chose the term carefully and we continue to use it
AE	6	Chapter 3, Results	While the identification of pathological conditions among the skeletal sample is impressive, the report could benefit from more interpretation of the pathological data.		This is virtually the same comment as #46. As mentioned in the response to #46, most of the conditions used in this analysis are non-specific indicators of stress and disease. They are used to reconstruct general health status. We cannot identify specific pathogens.
AE	8	Chapter 3, Results	Beyond the general site history there is no discussion of the interment of indigents or the county burial of cadavers/medical waste. Was any physical evidence found of indigent burials during excavations? More information on the use of the property as a medical waste facility; and further discussion of autopsy at the turn of the century should be explored.		We have no information on specifics of indigent burials. No. We have no further information on use as a medical waste facility and only two skulls with possible autopsy cuts. The crematorium stopped accepting medical waste in the 1990s.
AE	34	Chapter 3, Results	Include the Minimum Number of Individuals (MNI) in the summary paragraphs in Section 8.1, page 44.		Revised.
AE	35	Chapter 3, Results	The subheading <b>Other Inclusions or Offerings</b> under Recoveries descriptions frequently does not indicate the context within which the artifacts were found. Were they recovered from in situ or in fill surrounding the burial?		Many graves are crushed by weight of soil above. The coffin lid and sometime sides collapse and objects within the grave move during these collapse events. We present the information as accurately as possible.

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	36	Chapter 3, Results	There are inconsistencies between data on the maps (i.e. Figure 8.2, 8.3, and 8.4) and summaries of the recoveries. For instance, the Figure 8.2 depicts Recovery 1E as an empty coffin yet Table 8.1 and the summary on p. 55 indicate that skeletal remains were present. This is also true for 14E, 24E, and 54E. Recovery 52E is depicted on the map as “Human Remains (No Coffin)” yet the text on page 55 describe the remnants of a coffin. These inconsistencies were observed throughout the document and a close comparison of text and figures is required.		Revised
AE	37	Chapter 3, Results	The line spacing and formatting throughout this chapter are inconsistent.		Revised
AE	38	Chapter 3, Results	Methods used to determine age, race and sex are sometimes vague. For instance, in the Summary for 15E, page 101, it states that “the sex of the individual was determined to be female based on cranial morphology.” To be consistent with the rest of the document, the specific attributes used to determine sex, in this case, should be listed. See also 17E, 19E, 23E, 27E, 42E (ancestry), and 27E, 30E, 31E, 33E, 35E, 44E (sex), and elsewhere in the document. Further, when providing estimates for age, sex and race, multi-factorial methods should be always be used (Bass 1995).		Methods were revised to clarify. Specific attributes are listed in osteo catalog. Multiple traits are best but single traits are not invalid, they just have a greater possibility of error. Since generally single traits were all we had, we report them.
AE	39	Chapter 3, Results	Several individuals (Recoveries 51E, 52E, and 53 E) were partially removed. Will the skeletal remains that were removed be reinterred with the remains that were left in place? The partial removal of the remains in three cases could offend the descendants of the deceased (if any are identified). Perhaps these three cases warrant further consideration with regard to the reburial of excavated remains.		No. There were physical factors that made full removal impractical.

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	40	Chapter 3, Results	The presence of a single tooth does not imply that a second individual was present in Recovery 96B (pg. 331).		It does in this case. It seems that the comment was that the deciduous incisor might not be a second individual since the primary individual is an adolescent. However, the exact age range for the primary individual is between 18 and 21 years old, clearly over the age of 6 to 8 years when a child would lose a first incisor. The primary individual also has both 1 <sup>st</sup> maxillary incisors, indicating the presence of a second individual.
AE	70	Chapter 3, Results	Table 8.1: include “Sex” as a category in Summary Table	Consider comment.	Revised
AE	71	Chapter 3, Results	The phrase “ <i>more interesting</i> artifacts are discussed in detail elsewhere” is judgmental.	Revise.	Part of our responsibility is to determine what is significant versus insignificant. Very judgmental.
AE	72	Chapter 3, Results	Beginning on Page 55, in Osteological Attributes, a figure is referenced as Figure with no Figure number, yet the referenced figure is labeled as Figure 8.4. This error occurs throughout the recovery section in Chapter 8.	Include appropriate Figure number in the text throughout the Recoveries section	Revised
AE	73	Chapter 3, Results	On page 56, in the Osteological Summary, it states that the individual is represented by dentition and a few various long bone fragments yet the Figure 8.4 suggests that complete arm bones (ulnae and radius) were present. The elements should be filled in to accurately represent what was recovered. This occurs throughout the Recoveries section.	Cross check text with table/illustrations.	We revised this but the fact remains that even when a whole bone is “represented” it may be present in fragments.
AE	74	Chapter 3, Results	It is not clear that there are two burials in the overall summary of Mortuary Attributes. It is not clear where Recovery 3Ea was relative to 3Eb. This is also true for 6E, 7E, 9E, 30E. Also, in some cases the Mortuary Attributes section appears to be combined for both individuals so it is not always clear which artifacts (clothing, personal items, offerings) were associated with individual A and which were associated with individual B (i.e. 3E, 7E).	Clarify	It is stated in the introduction to this section that multiple individuals were recovered from what appeared to be one coffin. If they had been separate they would have different numbers.

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	75	Chapter 3, Results	The Inventory and Preservation section lists fragmented cranial vault and limb bones, yet <i>os coxae</i> are described in the Age category.	Revise	Revised
AE	76	Chapter 3, Results	Long lists of measurements of enamel hypoplasias relative to the CEJ such as this one could be summarized in a table.	Consider comment	The data is present in tables in the osteo appendix.
AE	77	Chapter 3, Results	Missing figure for 6Eb.	Include figure for 6Eb	Unchanged since we chose not to illustrate..
AE	78	Chapter 3, Results	The sentence “An assemblage of grave goods found during recovery led us to consider that this area might have a different demographic... This is an improper use of “demographic”	Revise.	Revised.
AE	79	Chapter 3, Results	For 19E, it states that a steak bone was found beside the left humerus, while the next section states that it resulted from near surface trash being displaced by heavy equipment. The association of this item with the burial warrants further clarification.	Clarify	It was found next to the humerus. Error in next section revised.
AE	80	Chapter 3, Results	Age estimates were determined by the phase of the auricular surface of the <i>os coxa</i> . Provide an age range to be consistent with the rest of the document.	Consider comment	Revised.
AE	81	Chapter 3, Results	The presence of osteoarthritis should not be used as a primary criterion for age determination. Osteoarthritis can occur as early as age 20 (Stewart 1958). Either provide justification for the age estimate of >40 or change age category to “adult.”	Revise	Revised in methods section.
AE	82	Chapter 3, Results	Dentition missing from the Skeletal Summary of 23E.	Consider comment	Revised
AE	83	Chapter 3, Results	The individual recovered from 31E was determined to be female based on cranial morphology but was determined to be between the ages of 12 and 21. Most researchers in following Bass (1995) would argue that subadults and adolescents cannot be accurately sexed.	Consider comment	Even though a broad age range was given for this individual, it was estimated that this individual was closer to the upper range of 21 years and an assessment of sex was performed.
AE	84	Chapter 3, Results	In the last sentence, the glenoid cavity of the humerus should be changed to glenoid cavity of the scapula.	Revise.	Revised.

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	85	Chapter 3, Results	Under subheading <b>Other Inclusions or Offerings</b> coins are not listed in chronological order. Is there significance to the order in which they are listed?	Consider comment.	Revised in order of monetary value.
AE	86	Chapter 3, Results	Be consistent with age categories outlined in the Osteological Methods section of the report. For instance, in this section (Recovery 68E), “juvenile” should be “subadult” and “young teenager” should be “adolescent.”	Revise.	No revisions necessary. The age categories listed in the osteological sections do not necessarily correspond to typologies described in the artifact sections.
AE	87	Chapter 3, Results	Sentence starts with Brick markers. This should be Brick burial markers.	Revise.	Revised.
AE	88	Chapter 3, Results	In the “Coffin Size and Shape” category, it states: “the burial was left in the wall, hindering an accurate determination of shape and size. Change “hindering” to a less-offensive word such as “limiting.”	Wording may be considered offensive; revise.	Wording is appropriate. Unchanged.
AE	89	Chapter 3, Results	CR 1, the use of the term “mass of ashes” could be offensive. Also, provide a discussion of context. At what depth were the remains found, were they interred in a pit? What was the size of the pit?	Revise and provide additional information.	Revised
AE	90	Chapter 3, Results	7-Up green is not an analytic term.	Consider comment.	“7-Up” green is an analytical term used by the Bureau of Land Management’s Historic Glass Bottle Identification & Information Website, hosted by the Society for Historical Archaeology. <a href="http://www.sha.org/bottle/index.htm">http://www.sha.org/bottle/index.htm</a>

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	4	Chapter 4, History	<p>Chapter 7, Subsection 7.3 of the History, focuses too heavily on Chinese death rites. Based on the forensic analysis attained as a result of archaeological excavations, multiple cultures are represented in the individual burials recovered from the former county cemetery. Death rites of other population groups represented in the sample, or a more general discussion of common historic-era burial practices from the 1880s through the 1920s should also be considered.</p> <p>Perhaps it is at this point that the discussion of the Victorian-era beautification of death movement should be introduced, as it aptly describes the treatment of Anglo-American remains at a time when consumerism was rapidly expanding in all aspects of American life. It should be offered as distinct from traditional Chinese burial practices. While it is true that the Chinese adopted some western burial accoutrements (western clothing and coffin/casket hardware) this was a matter of commodity availability. Historical records and the material culture recovered from the county cemetery make it clear that the Chinese adhered to tradition in performing burials rites in as far as possible.</p>		<p>The only primary sources we were able to locate were about the Los Angeles Chinese. There are no sources of information about the Los Angeles indigents of the previous century. We requested you provide sources and you were unable to do so. We have provided brief generic sections since that is the only information available.</p> <p>Traditional Chinese death rituals had significant components of display, mourning, graveside ritual, etc. which are very similar to the beautification of death movement. First hand accounts indicate Chinese buried in white western suits – not a matter of commodity available since virtually all clothing was dark in that era. The existence of lotus blossom coffin ornaments also demonstrates the power of the Chinese as consumers.</p>
AE	30	Chapter 4, History	The Historic Los Angeles Cemetery is described as an indigent cemetery with a Chinese component, yet this chapter focuses heavily on the Chinese component (see Section 7.3) with little to no historical background on the other populations represented in this cemetery. This section could benefit from a broader background on indigent cemeteries and a review of historical burial rites that broad-brush other representative groups in the cemetery.		<p>The only primary sources we were able to locate were about the Los Angeles Chinese. There are no sources of information about the Los Angeles indigents of the previous century. We requested you provide sources and you were unable to do so. We have provided brief generic sections since that is the only information available.</p>

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	31	Chapter 4, History	Throughout the fourth paragraph on page 29, and the last sentence on page 34, the devil is referenced. Use appropriate terms such as malevolent spirits or angry spirit ghosts as they are cited in the original sources (see Chung and Wegars 2005). Reference to the “devil” in newspaper articles are decidedly Anglo-centric and do not reflect the Chinese cultural perspective. When using this term as a quote, it should be so noted.		Revised to malevolent spirits. Modern Chinese continue to describe the function of items such as the zig-zag bridge in Hong Kong using the term the devil. The newspaper articles are presented as quotes.
AE	32	Chapter 4, History	Between pages 31 and 38 multiple citations in the form of lengthy quotes from Los Angeles newspapers on Chinese death rituals are provided. While the deceased name, the source, and the date of the article is indicated in parentheses at the end of the quote, it is not immediately clear that this is the information being offered. To break up this text, it is recommended that the deceased name be provided as a subheading with the reference following. For example:  <b>Ah Yet Kee deceased</b> ( <i>Los Angeles Daily Star, August 8, 1877</i> ). with the text to follow.		We added a statement about the form and origin of the quotes.
AE	33	Chapter 4, History	At the end of this discussion provide a concluding paragraph stating what all of this has to do with the county cemetery.		Okay.
AE	62	Chapter 4, History	Figure 7.2 should include Brooklyn Street on the map as it is discussed in the text.	Revise	It is labeled (Brooklyn – now Cesar Chavez). However, we have changed this map in the final report.
AE	63	Chapter 4, History	“The Chinese cemetery apparently did not have an American name:”	Replace American with official name.	Revised
AE	64	Chapter 4, History	The structures, a memorial shrine and twin burners ...are located at about the <i>center of the original length of the cemetery</i> . The latter phrase is unclear.	Revise	Revised
AE	65	Chapter 4, History	The genesis of construction appears to have been a mishap during the Hungry Ghost Festival in 1888. This sentence is unclear.	Clarify	Revised

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	66	Chapter 4, History	"By 1949, a complex of structures was located at HLAC (Figure 7.4)." The caption for Figure 7.4 indicates this is the 1949 Sanborn map. It is the 1928 Sanborn map.	Revise	Revised
AE	67	Chapter 4, History	The sentence "County documents introduce a mythology that the County purchased an already established cemetery "citing Barr 1955. Recommend rephrasing this to "A letter from the Superintendent to the Board of Supervisors erroneously stated ....	Consider comment.	Revised plus we have added an appendix with this and similar documents.
AE	68	Chapter 4, History	The third paragraph starts with: "Chinese religions (3 major)..." List the three religions: Confucianism, Daoism, and Buddhism.	Consider comment.	Revised
AE	69	Chapter 4, History	In the fourth paragraph, second sentence (They-the biscuits, not the plates...there was not a suspicion of a crust on any of the ____). The last part of the sentence is missing	Revise	Revised
AE	41	Chapter 5, Grave Things	"Grave Things" seems jargonistic and a little disrespectful. Consider changing the title of this section to <b>Grave Offerings: Mortuary Material Culture</b> .		Unchanged
AE	42	Chapter 5, Grave Things	On page 584, final paragraph, it is stated that the metal lids observed among several of the Chinese burials may have protected the living from the spirits of the dead, yet in the recovery summaries in Chapter 8, it is suggested that the lids may have been used to prevent further dissemination of communicable diseases. Clarify, be consistent, and cite sources.		Revised
AE	91	Chapter 5, Grave Things	"The movement was adopted by Victorians." There was a philosophical movement which was based in Victorian principals, to which many adhered, but these individuals were not referred to as Victorians.		Revised

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
GH	4	Chapter 6, Here Lies	The chapter on demographics was both poorly analyzed with very faulty conclusions. The fact that Chinese were buried as high as ten times their proportion in the general population for 1890/1900 clearly skewed the other ethnic populations compared, making a faulty conclusion that percentage of blacks were similar to their percentage in the population. Are the authors of the report showing a bias in not recognizing that racial minorities in late 19 <sup>th</sup> century Los Angeles occupied a larger percentage of the indigent population for which this cemetery was for.	That the MTA and its advisory boards NOT accept this report as submitted. That a team with expertise in historical/cultural resources can be consulted to obtain a better assessment of historical/cultural resources were recovered and what remains to be done.	Our analysis is correct and consists of simple numerical facts. Stated another way the ratio of Chinese buried in the cemetery to those alive in the County at the time was 1:11, the ratio for blacks 1:119 and the ratio for whites 1:265. We concluded that the Chinese were overrepresented in the cemetery which is true and makes sense since this was the only Chinese cemetery from 1885-1922. We did not state that racial minorities dominate the cemetery because they did not – numerically, whites dominate the cemetery (2 whites for each minority person), as they did the general population.
AE	43	Chapter 6, Here Lies	Determining average life expectancy of the individuals based on skeletal age estimation is problematic because the age of approximately 78 individuals (according to Figure 10.6) were classified as Adult (non-specific) or Indeterminate. Therefore, a statistically viable average of life expectancy based on such broad categories is not possible. Also, Table 10.6 includes an “Indeterminate” category (approximately 20 individuals); however, this category is not listed in Table 10.1 on the next page (pg. 603).		Changed average life expectancy to median age category. Added indeterminate category to table.
AE	44	Chapter 6, Here Lies	The number of infants in the sample is surprisingly low and atypical for a late nineteenth/early twentieth century cemetery population. Also, there are no Old Adults in the sample, which is also unusual, especially when compared to the burial registers and age-at-death tables in Chapter 10. Further discussion of such discrepancies is necessary.		There were no individuals specifically over the age of 50 years, so middle category is combined with the old category in Here Lies. The lack of infants is further discussed. However, we excavated a tiny percentage of the cemetery so sampling bias is to be expected.

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	45	Chapter 6, Here Lies	The term “bioarchaeology” (p. 604) is misused here. Bioarchaeology is defined as the use of a range of biological techniques on archaeological material in order to learn more about past populations, which includes the study of disease and trauma. The subject heading should be more specific to the content of this section, which is a review of pathological conditions observed in the sample.		Revised.
AE	46	Chapter 6, Here Lies	This section includes a good overview of the pathological conditions that were observed in the sample; however, the pathological conditions described in this section represent both specific and non-specific indicators of nutritional stress, diet, disease, trauma, and habitual activities. There is little to no interpretation of data presented in the section. Individuals with various pathological conditions should be discussed on a case-by-case basis to better understand types of diseases and nutritional deficiencies that these individuals were experiencing. This section could benefit from a discussion of the diseases and other conditions that were common among indigents during this time. Also, burial registers (Chapter 10: Cause and Age at Death) indicate that lung disease and tuberculosis were among the major causes of death; therefore, a discussion on the possible skeletal indicators of these diseases should be provided.		A brief discussion of the pathological conditions and their respective causes is added. However, most of the pathological conditions used in this study are non-specific indicators of disease and cannot be associated with particular etiologies. Relatively few pathogens can be identified on skeletal remains and most of those must be in very advanced stages.
AE	92	Chapter 6, Here Lies	Stature estimates and the discussion on stature should be excluded because an osteometric board was not used for measurement of long bones.	Consider comment.	Use of modern electronic tools does not invalidate results. See revised measurement methods.
AE	93	Chapter 6, Here Lies	Table 10.13 is titled “Causes of Death in the Sample” but lists causes of death from the burial records, not the skeletal sample. This is also the case for Figure 10.9.	Consider comment	They are now “Causes of Death in the Burial Population” and “Age of Death in the Burial Population.”

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	7	Chapter 7, Comparisons	Discussion is warranted on the following topics: grave orientation and representation of non-race based groups such as the Independent Order of Odd Fellows and the possible woman-member of this fraternal group. Demographics and economic status could also be explored further. If not possible within funding constraints or restrictions imposed by interested parties, the data potential or data limitations should be clearly stated.		Decisions have to be made on every project with a budget. Again, all data is provided so other analysts are free to make their own decisions.
AE	47	Chapter 7, Comparisons	The comparisons to the two other cemeteries (San Francisco and Virginiatown) are very informative and provide interest reading.		Thanks.
AE	48	Chapter 8, Conclusions	This section is succinct and provides an excellent summary of the findings from this extensive body of work. A statement discussing the reburial of human remains and curation of artifacts should be included in this section.		Thanks and see responses to comments 11 & 29.
AE	1	overall	The glossary of terms provided in Appendix C is very informative	a list of acronyms would also be useful and should be presented at the beginning of the report.	We have chosen to remove all acronyms

<b>from</b>	<b>#</b>	<b>Section</b>	<b>Comment</b>	<b>Recommendations</b>	<b>Cogstone Response</b>
AE	2	overall	The use of an acronym identifying the Los Angeles county cemetery and later the Golden Gate cemetery relegates both cemeteries to an impersonal status which may not accurately reflect their historic importance as a spiritual place where the living parted with their newly deceased loved ones. Historically, the county cemetery was deeded as an indigent graveyard and has on occasion been referred to as a pauper cemetery. However, burial plots were sold to private individuals and both elaborate and modest burial ceremonies were performed. Such ritual display conveys a social and spiritual importance beyond the impersonal interment of unnamed and/or unclaimed individuals, such as suicides, murder victims, and medical cadavers. Such a usage, sanctioned by the county and city of Los Angeles, argues for a place in history beyond a mere acronym. Further, the use of acronyms or the designation of LA county cemetery is inconsistently applied.		We have chosen to remove all acronyms.
AE	3	overall	The early descriptive chapters and discussion of methods are very thorough, but should be considered closely for redundancy, clarity, and consistency in formatting.		okay