# **JUNE 2004**

#### THE COUNCIL OF THE CITY OF NEW YORK

Hon. Gifford Miller Speaker



#### A STAFF REPORT TO

#### THE COMMITTEE ON OVERSIGHT AND INVESTIGATIONS

Hon. Eric Gioia Chair

THE SUB-COMMITTEE ON PUBLIC HOUSING

Hon. Diana Reyna Chair

# NYCHA Housing: Access Granted



## THE COUNCIL OF THE CITY OF NEW YORK

## HON. GIFFORD MILLER

SPEAKER

## <u>Members of the Committee on</u> <u>Oversight and Investigations</u>

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# **EXECUTIVE SUMMARY**

Over 400,000 people live in public housing in New York City, more than the entire population of Miami, Florida or Atlanta, Georgia. New York City public housing truly is a city within a city. Unfortunately, an investigation of 479 buildings in 25 public housing developments by the New York City Council Investigation Division finds that a trespasser trying to gain access to a New York City Housing Authority (NYCHA) building by the front door succeeded nearly half the time—without a key or entry card. Although NYCHA has spent millions of dollars over the past decade to upgrade building entrances and make them more secure, residents may nevertheless be jeopardizing their own safety by propping open doors and giving strangers access to their homes.

At one small Brooklyn development,<sup>1</sup> investigators were able to enter all of the buildings; at a large development in the Bronx, they were able to enter 86% of buildings. Additionally, investigators found 92% of building entrances propped open in another Brooklyn development, and were let into 87% of buildings in a Manhattan development.

NYCHA operates 346 housing developments comprising 2,800 residential buildings and 182,000 apartments. Created in 1934, NYCHA is the largest public housing authority in North America. Funded by the U.S. Department of Housing and Urban Development (HUD), it houses over 174,800 low-income families and approximately 418,834 authorized residents.<sup>2</sup> One of NYCHA's

<sup>&</sup>lt;sup>1</sup> In the interest of residents' safety, the names of the housing developments are not disclosed. <sup>2</sup> "The New York City Housing Authority Fact Sheet," New York City Housing Authority

<sup>(</sup>NYCHA). http://home.nyc.gov/html/nycha/html/factsheet.html (Last accessed 24 Jan 2004).

stated missions is to provide decent and affordable housing in a safe and secure living environment.<sup>3</sup>

In addition to NYCHA's significant capital investment in upgrading building entrances—at least \$16.7 million over the past 10 years—safety in NYCHA developments is ensured by the Housing Bureau of the New York City Police Department (NYPD).<sup>4</sup> The more than 1,700 uniformed personnel assigned to the NYPD Housing Bureau operate out of nine Police Service Area (PSA) commands.<sup>5</sup> Besides routine patrols, nine NYCHA developments receive additional police services through Operation Impact, which targets high-crime areas. Fifteen NYCHA developments are also monitored by a network of closed circuit cameras, called the Video Interactive Patrol Enhancement Response (VIPER) System.

NYCHA depends on federal subsidies from the U.S. Department of Housing and Urban Development (HUD) for much of its operating budget. Decreases in federal funding to NYCHA have contributed to a \$303 million budget gap, resulting in cuts to or elimination of some public safety programs.<sup>6</sup> For example, HUD recently eliminated the Public Housing Drug Elimination Program, which allocated grants to support public safety initiatives.<sup>7</sup>

NYCHA locations experienced a 3.4% reduction of reported index crimes in  $2003.^8$  Crime, however, still persists. There were 287 shootings and 64

<sup>&</sup>lt;sup>3</sup> NYCHA Budget and Financial Plan Briefing. 14 Jan 2004. p.1.

http://home.nyc.gov/html/nycha/pdf/fy2004\_budget\_brief.pdf (Last accessed 24 Jan
2004).

<sup>&</sup>lt;sup>4</sup> Prior to April 30, 1995, the Housing Bureau had been a separate police agency, the Housing Authority Police Department.

<sup>&</sup>lt;sup>5</sup> Ibid.

<sup>&</sup>lt;sup>6</sup> "As Federal Aid Drops, City's Cost for Policing Public Housing Climbs." *Inside the Budget*. New York City Independent Budget Office (IBO). No.128, 15 Apr 2004. <sup>7</sup> *Ibid.* 

<sup>&</sup>lt;sup>8</sup> Jaffe, Joanne (Chief of the Housing Bureau). "Operation Impact II" Message from the Housing Bureau Chief, monthly report. *NYCHA Journal*. Vol.34. No. 2, February 2004. *See also* Statement of Inspector Michael Phipps, Commanding Officer, Housing Bureau Manhattan,

killings on Housing Authority grounds, and 5,506 residents of public housing fell victim to a major crime in 2003.<sup>9</sup> While the NYPD keeps statistics on crime in NYCHA developments, these numbers are not made public in the CompStat crime summaries posted on the NYPD's website.

New York City Council investigative staff conducted an investigation of 479 buildings in 25 randomly selected NYCHA developments throughout the City.<sup>10</sup> Each survey team consisted of two investigators who checked the front door of each building in the development.

#### **Key Findings**

- Of 479 buildings surveyed, investigators were able to gain entrance to 224 buildings (47%).
- Most often, investigators were able to enter because doors were propped open (46% of buildings entered), or because people let them in the buildings (38%).
- In the easiest-to-enter large development, investigators entered 86% of buildings.<sup>11</sup>
- Locks were broken on 36 doors (7.5%).

NYPD. 29 Apr 2004. Joint Oversight Hearing of the New York City Council Public Safety Committee and the Subcommittee on Public Housing on "Public Safety in Public Housing." <sup>9</sup> Statement of Inspector Michael Phipps, Commanding Officer, Housing Bureau Manhattan, NYPD. 29 Apr 2004. Joint Oversight Hearing of the New York City Council Public Safety Committee and the Subcommittee on Public Housing on "Public Safety in Public Housing.". <sup>10</sup> The sample consisted of approximately 10% of the NYCHA developments in the Bronx, Brooklyn, Manhattan and Queens, and approximately 20% of the developments in Staten Island.

<sup>&</sup>lt;sup>11</sup> Because some developments consist of only a small number of buildings while others have dozens, the results between such developments, in terms of percentages, are not comparable. We have therefore separated developments into different categories based on the number of buildings in each (less than 10, or 10 or more). This figure is for a development with 10 or more buildings. The highest percentage of buildings entered for a development with fewer than 10 buildings was 100%.

#### Recommendations

- Install security cameras at the entrances of all NYCHA buildings.
- Pass a resolution calling on the federal government to restore public safety funds to NYCHA.
- Post CompStat statistics for PSAs online.
- NYCHA should invest in electronic door locks that send alerts when locks are broken or doors are open too long.
- Routine NYPD patrols should note open doors and alert NYCHA management of problem locations.
- NYCHA should undertake a public awareness campaign reminding tenants of safety precautions that include never propping open doors or opening them for strangers.
- NYCHA should post signs in the lobby of each building reminding tenants that safety and security is also their responsibility.
- NYCHA should invest in and support tenant watch and patrol programs.

# BACKGROUND

The New York City Housing Authority (NYCHA) operates 346 housing developments comprising 2,800 residential buildings and 182,000 apartments. Created in 1934, NYCHA is the largest public housing authority in North America. Its facilities provide shelter to over 174,800 low-income families and approximately 418,834 authorized residents—which is 5.2% of the City's population.<sup>1</sup>

One of NYCHA's stated missions is to provide decent and affordable housing in a safe and secure living environment.<sup>2</sup> This investigation seeks to assess one measure of the safety and security of NYCHA developments—how easy it is for nonresidents to gain entry into NYCHA buildings.

## **Infrastructural Improvements**

NYCHA reports indicate that the agency undertook a citywide campaign to upgrade building security in 1994.<sup>3</sup> According to NYCHA Chairman Tino Hernandez, "This is in keeping with NYCHA's overall goal of making our 2,702 residential buildings as safe as possible by installing high-tech security entrances to prevent unauthorized persons from entering our buildings."<sup>4</sup> NYCHA has spent over \$16.7 million to replace entrances in

<sup>&</sup>lt;sup>1</sup> NYCHA fact sheet. Available at

http://www.nyc.gov/html/nycha/html/factsheet.html (Last accessed 24 Jan
2004).

<sup>&</sup>lt;sup>2</sup> NYCHA Budget and Financial Plan Briefing. 14 Jan 2004. Available at http://www.nyc.gov/html/nycha/pdf/fy2004\_budget\_brief.pdf (Last accessed 16 Apr 2004).

<sup>&</sup>lt;sup>3</sup> Wilson, Greg. "Housing Projects Getting New Locks." Daily News. 12 Jun 2001.

<sup>&</sup>lt;sup>4</sup> "New Security Entrances for Fulton Houses" (press release). NYCHA. 20 May 2002. http://www.ci.nyc.ny.us/html/nycha/html/prmay2002\_05.html (Last accessed 16 Apr 2004).

at least 11 developments citywide.<sup>5</sup> This includes \$1.5 million for 11 buildings at Fulton Houses in Manhattan, and \$1,280,083 for all 22 buildings at Astoria Houses in Queens.

NYCHA is currently facing a budget deficit of over \$300 million<sup>6</sup> and has had to use over \$137 million from its capital budget to help close this gap.<sup>7</sup> In addition, NYCHA has deferred over \$37 million dollars for building entrances until fiscal year 2005.<sup>8</sup> The largest portion of these deferments is over \$21 million for building entrance work in Brooklyn developments.<sup>9</sup>

## **Policing at NYCHA Developments**

In addition to having spent millions of dollars to upgrade entrances, NYCHA safety is ensured by the Housing Bureau of the New York City Police Department (NYPD).<sup>10</sup> The Housing Bureau's stated mission is

http://www.ci.nyc.ny.us/html/nycha/html/prdec2000 01.html.

<sup>&</sup>lt;sup>5</sup> Information consolidated from the following NYCHA press releases (last accessed on the Internet 16 Apr 2004): "Jefferson Houses to get new entrances." 3 Oct 2000. http://www.ci.nyc.ny.us/html.nycha/html/proct2002\_01.html; "New Security entrances for Fulton Houses." 20 May 2002.

http://www.ci.nyc.ny.us/html/nycha/html/prmay2002\_05.html; "Three Manhattan complex getting new entrances." 10 Oct 2000.

http://www.ci.nyc.ny.us/html/nycha/html/proct2000\_05.html; "Sixty-five Bronx buildings getting new security entrances." 5 Jun 2001.

http://www.ci.nyc.ny.us/html/nycha/html/prmay2001\_04.html; "Monroe Houses
to get new entrances." 11 Dec 2000.

<sup>&</sup>lt;sup>6</sup> New York City Independent Budget Office (hereinafter IBO). "As Federal Aid Drops, City's Cost for Policing Public Housing Climbs." *Inside the Budget.* No.128, 15 Apr 2004.

<sup>&</sup>lt;sup>7</sup> Briefing paper. Fiscal 2005 Executive Budget Hearing, Committee on Housing and Buildings. p10. Federal law permits NYCHA to transfer up to 20% of its capital budget to cover operating deficits in a given year (42 USCA § 1437g(g)(1), 1437g(g)(2) (West Supp. 2001)).

<sup>&</sup>lt;sup>8</sup> FY 2004 Capital Budget Exercise-Operations Projects Deferred to Out-Years, Dept. Of Budget and Financial Planning, Attachment C. March 2004.
<sup>9</sup> Ibid.

<sup>&</sup>lt;sup>10</sup> Prior to April 30, 1995, the Housing Bureau had been a separate police agency, the Housing Authority Police Department.

To provide a safe and secure environment in partnership with the public housing community, through impartial enforcement of laws and the delivery of comprehensive police service, with respect for the fundamental constitutional rights of all persons.<sup>11</sup>

The Housing Police operate out of nine Police Service Area (PSA) commands, with more than 1,700 uniformed personnel assigned to the NYPD Housing Bureau.<sup>12</sup>

NYPD Housing Bureau officers regularly engage in "vertical patrols" of NYCHA buildings to check each building's publicly accessible spaces rooftops, hallways, lobbies, stairways and landings.<sup>13</sup> Additionally, NYCHA participates in the Trespass Affidavit Program, which gives the NYPD permission for officers to enter NYCHA buildings, and stop and question people they encounter to determine if they are intruders. Nonresidents who are not found to have any business in the building can be arrested for criminal trespassing.<sup>14</sup>

In addition to routine patrol activities, certain target developments receive additional security measures. Fifteen developments are wired for a closed-circuit security camera system known as the Video Interactive Patrol Enhancement Response (VIPER) System. The 15 VIPER locations are equipped with a total of 3,160 cameras. Cameras view only those areas normally visible to the public, and where officers on patrol would have access during vertical patrol.<sup>15</sup> Police officers regularly review the VIPER cameras' recordings.

<sup>&</sup>lt;sup>11</sup> Statement of Inspector Michael Phipps, Commanding Officer, Housing Bureau Manhattan, NYPD. 29 Apr 2004. Joint Oversight Hearing of the New York City Council Public Safety Committee and the Subcommittee on Public Housing on "Public Safety in Public Housing."

<sup>&</sup>lt;sup>12</sup> *Ibid.* 

<sup>&</sup>lt;sup>13</sup> A vertical patrol is the "tactically planned patrol of the interior hallways, stairways, and rooftops of selected multiple occupancy buildings" (NYPD Patrol Guide Procedure No. 212-59, issued 1 Jan 2000).

<sup>&</sup>lt;sup>14</sup> Phipps.

<sup>&</sup>lt;sup>15</sup> Phipps.

Another program, Operation Impact, began in January 2003 as a crime reduction strategy deploying 1,000 police officers to targeted high-crime locations to prevent serious and violent crimes. This Operation has been credited with cutting crime by 33% citywide. Nine NYCHA developments in two PSAs (PSA 2 and PSA 7) are part of Operation Impact, which includes Brownsville Houses in Brooklyn and Mott Haven Houses in the Bronx.<sup>16</sup> In 2003, index crimes in the PSA 2 and PSA 7 Impact zones dropped 28% and 23%, respectively.<sup>17</sup>

According to the NYPD, crime rates continue to fall citywide, including in public housing. Housing Authority locations experienced a 3.4% reduction of reported index crimes in 2003,<sup>18</sup> which included 287 shootings and 64 killings on Housing Authority grounds.<sup>19</sup> In that time, more than 21,000 persons were arrested for crimes committed in public housing developments, over 60,000 summonses were issued for quality-of-life offenses, and 5,506 residents of public housing fell victim to a major crime.<sup>20</sup>

When the NYPD and the Housing Authority Police Department (HAPD) merged in 1995, NYCHA and the NYPD entered into a Memorandum of Understanding requiring NYCHA to make annual payments to the NYPD equal to NYCHA's HAPD expenditures, adjusted for inflation in progressive years.<sup>21</sup> These payments have failed to keep pace with the

<sup>&</sup>lt;sup>16</sup>Jaffe, Joanne (Chief of the Housing Bureau). "Operation Impact II" Message from the Housing Bureau Chief, monthly report. *NYCHA Journal*. Vol.34. No. 2, February 2004. *See also* Phipps.

<sup>&</sup>lt;sup>17</sup> *Ibid.* 

<sup>&</sup>lt;sup>18</sup> *Ibid.* 

<sup>&</sup>lt;sup>19</sup> Phipps.

<sup>&</sup>lt;sup>20</sup> Phipps.

<sup>&</sup>lt;sup>21</sup> IBO. In 1995, NYCHA was paying \$58 million on HAPD police services.

NYPD's actual costs of policing NYCHA developments.<sup>22</sup> In addition, the U.S. Department of Housing and Urban Development (HUD) has cut the Public Housing Drug Elimination Program (DEP) Grant, from which NYCHA was able to reimburse the NYPD nearly \$20 million annually for police services.<sup>23</sup> Additional cuts to NYCHA's federal operating subsidy have contributed to a \$303 million budget gap in this calendar year that is resulting in NYCHA's inability to adequately fund its public safety programs.<sup>24</sup>

<sup>&</sup>lt;sup>22</sup> *Ibid*.

<sup>&</sup>lt;sup>23</sup> Ibid.

<sup>&</sup>lt;sup>24</sup> *Ibid.* 

# **METHODOLOGY**

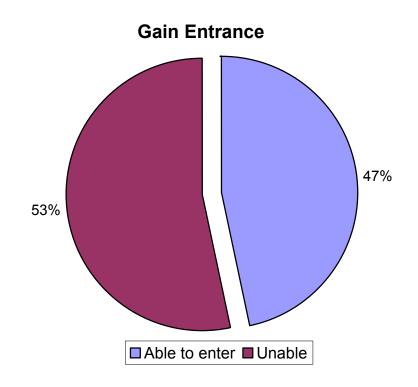
The New York City Council Investigation Division (CID) surveyed 10% of NYCHA developments in Manhattan, Queens, Brooklyn and the Bronx. To compensate for the small number of NYCHA developments in Staten Island, 20% of developments in that borough were surveyed. The 25 developments surveyed were randomly selected, for a total of 479 buildings in the five boroughs.

Of the 479 buildings checked, 112 (23%) were in Bronx, 172 (36%) in Brooklyn, 99 (21%) in Manhattan, 80 (16%) in Queens, and 17 (4%) in Staten Island.

A survey team of two investigators visited each development and attempted to enter the front door of every building. If they were successful in entering the building, investigators also assessed the cleanliness of the lobby and whether graffiti was present.

# FINDINGS

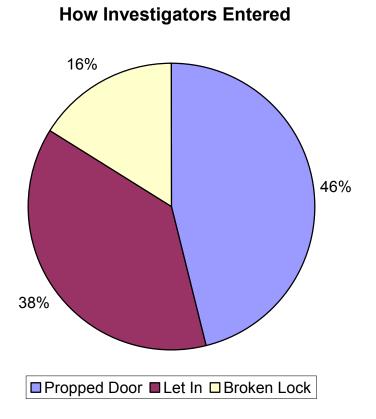
Out of 479 buildings, CID was able to gain entrance to 224 buildings (47%).



Investigators gained access in three ways:<sup>25</sup>

- Locks were broken on 36 doors (16%).
- One hundred three doors (46%) were propped open.
  - These doors were most often propped opened with bottle caps or small stones, but investigators also observed garbage bags being used to keep doors from locking, and even doors tied to metal guardrails to keep them open.
- Investigators were let into 86 buildings (38%).

<sup>&</sup>lt;sup>25</sup> These numbers total 225 rather than 224 because in one case, investigators were let into a building but discovered that the lock on the door was also broken.



CID investigators found that of the 479 buildings, 140 front doors (29%) were not locked.<sup>26</sup> Four hundred and four buildings (84%) had no security camera.

Overall, the lobbies of the buildings where CID gained entrance appeared to be in good condition. Of the 224 buildings investigators were able to enter, 194 of the lobbies (87%) were found to be clean, and 222 (99%) had sufficient lighting. Only 22 lobbies (10%) had some form of graffiti. All the mailboxes checked were in working order.

 $<sup>^{26}</sup>$  Either the door was propped open (103), the lock was broken (36) or, in one case, the Tenant Patrol was in the building lobby with the front door unlocked.

## **Results by Development**

In addition to the investigation's cumulative findings, results were analyzed by development as follows.<sup>27</sup>

#### Ease of Unauthorized Entry, Developments with 10+ Buildings:<sup>28</sup>

•	Highest: Development 3, Bronx	86%
•	Lowest: Development 25, Staten Island	0%
•	Average	46%

#### Ease of Unauthorized Entry, Developments with <10 Buildings:

• Highest: Development 20, Brooklyn	100%
• Lowest: Development 24, Staten Island	33%
Average	69%

#### **Propped-Open Doors:**

Highest: Development 15, Brooklyn	92%
• Lowest: Developments 8, 10, 11 and 13	0%
• Average	34%

#### Let In by Others:

•	Highest: Development 8, Manhattan	87%
•	Lowest: Development 2, Bronx	20%
•	Average	46%

<sup>&</sup>lt;sup>27</sup> In the interest of residents' safety, the names of the housing developments are not disclosed. Each has been assigned a number instead.

<sup>&</sup>lt;sup>28</sup> Because some developments consist of only a small number of buildings while others have dozens, the results between such developments, in terms of percentages, are not comparable. We have therefore separated developments into different categories based on the number of buildings in each development.

#### **Broken Locks:**

•	Highest: Development 11, Manhattan	62%
•	Lowest: Developments 12, 13, 24 and 25	0%
•	Average	16%

# CONCLUSION

Over the past decade, NYCHA has spent millions of dollar to upgrade and install new high-tech electromagnetic locks and stainless steel security doors as part of its efforts to make its residential buildings safer and to prevent unauthorized persons from entering. Nevertheless, this investigation's findings indicate that it is still shockingly easy to gain entry into a NYCHA building. Residents are jeopardizing their own safety by propping open doors and letting strangers in their buildings. Results showed that of the instances when investigators were able to enter NYCHA buildings, 46% of the time doors were propped open. Survey data also revealed that tenants exiting buildings, or residents standing in the lobbies or entrances allowed investigators in 16% of the time.

While some residents may be lax in ensuring their building's security, this does not negate NYCHA's responsibility to provide safe and livable residential communities. Housing Authority buildings are not considered to be public spaces, and as such, the only persons who are permitted to enter these buildings are the residents, their invited guests, NYCHA employees or any other person with a reasonable explanation for being there. Tenants should be seriously concerned that investigators were able to gain access to NYCHA buildings 47% of the time.

# RECOMMENDATIONS

• Install security cameras at the entrance of all NYCHA buildings.

It is easy to enter NYCHA buildings, as investigators found. Security cameras would deter people entering with the intent to engage in unlawful activity.

• The New York City Council should pass a resolution calling on the federal government to restore public safety funds to NYCHA.

Because of cuts to its federal operating subsidy, as well as the complete elimination of DEP grants, NYCHA cannot adequately fund public safety programs, and has fallen behind in completing necessary upgrades to building entrances.

#### • Post CompStat statistics for PSAs online.

CompStat statistics available online currently include crime statistics only for the 123 geographic precincts in the City. Members of the public, and NYCHA residents in particular, are entitled to know the incidence of crime in public housing developments.

• NYCHA should invest in electronic door locks that send alerts when locks are broken or doors are open too long.

NYCHA should take advantage of 21<sup>st</sup> Century technology to equip developments with a door locking system that alerts management and/or the NYPD when locks are damaged or when doors are open longer than would be safe for residents. • Routine NYPD patrols should note open doors and alert NYCHA management of problem locations.

During vertical patrols, NYPD officers routinely report to NYCHA on a number of building maintenance issues they may encounter. Apprising NYCHA of the incidence and location of open doors could help NYCHA management to target outreach and other resources to problem areas.

• NYCHA should undertake an aggressive public awareness campaign to remind tenants of safety precautions that include never propping open doors or opening them for strangers.

NYCHA produces a newsletter, the *NYCHA Journal*, and delivers it directly to residents' doors monthly. This newsletter is a unique vehicle by which NYCHA can communicate to its tenants. As we enter the summer months when more people are typically out-ofdoors, NYCHA should use this resource to reach out to tenants and remind them of the precautions they should be taking with regard to building security.

- NYCHA should post signs in every lobby of each building reminding tenants that safety and security is also their responsibility.
- NYCHA should invest in and support tenant watch and patrol programs.

# **APPENDIX A**

# Listing of Results by Development

### **Results by Development**

Development	Boro	Bldg.	Doors locked?	Able to Enter?		How?		Acces	s to building
			Yes	Yes	Propped Open	Let in	Broken	Key	Magnetic
1	Bronx		91%	36%	25%	75%	0%	0%	100%
	Bronx		56%	56%	60%	20%	20%	0%	100%
	Bronx		57%	86%	50%	50%	0%	0%	100%
	Bronx		57%	71%	40%	40%	20%	0%	100%
5	Bronx		63%	75%	17%	50%	33%	0%	100%
	Bronx		92%	18%	43%	57%	0%	0%	100%
	Bronx		63%	50%	33%	25%	42%	0%	100%
Bronx	Totals	111	82	51	20	22	9	0	111
			74%	46%	39%	43%	18%	0%	99%
8	Manhattan		95%	42%	0%	88%	13%	0%	100%
	Manhattan		86%	31%	44%	56%	0%	0%	100%
10	Manhattan		78%	67%	0%	83%	17%	0%	100%
11	Manhattan		50%	80%	0%	38%	63%	0%	100%
12	Manhattan		88%	41%	29%	71%	0%	0%	100%
13	Manhattan		73%	67%	0%	60%	40%	0%	100%
Manhattan	Totals	99	81	48	6	31	11	0	99
			82%	48%	13%	65%	23%	0%	100%
14	Brooklyn		85%	38%	20%	70%	10%	35%	65%
	Brooklyn		20%	85%	95%	5%	0%	0%	100%
	Brooklyn		95%	13%	20%	60%	20%	0%	100%
	Brooklyn		46%	67%	50%	13%	38%	0%	100%
1	Brooklyn		80%	80%	25%	75%	0%	0%	100%
	Brooklyn		74%	39%	67%	33%	0%	0%	100%
	Brooklyn		33%	100%	33%	44%	22%	0%	100%
Brooklyn	Totals	172	103	92	58	24	10	9	163
-			60%	53%	63%	26%	11%	5%	95%
21	Queens		27%	77%	76%	6%	18%	0%	95%
	Queens		71%	36%	60%	20%	20%	0%	79%
23	Queens		91%	20%	22%	56%	22%	0%	100%
Queens	Totals	80	56	31	18	7	6	0	76
			70%	39%	58%	23%	19%	0%	95%
24	S.I		100%	33%	50%	50%	0%	0%	100%
	S.I		100%	0%	0%	0%	0%	0%	100%
Staten Island	Totals	17	17	2	1	1	0	0	17
			100%	12%	50%	50%	0%	0%	100%
Citywide	Totals	479	339	224	103	85	36	9	466
			71%	47%	46%	38%	16%	2%	97%