

**May 12, 2026**

To: Chair, and Members of the Service Excellence Committee  
From: Diane Chester, Neighbour of St. Felix Centre 24-hour Emergency Shelter  
Re: **2026.SE12.1 - Simplifying the 311 Intake Experience: 311 & Noise ByLaw**  
Complaints—NEW Rooftop Mechanical Equipment Installed at the St. Felix Centre 24-Hour  
Emergency Shelter at 629 Adelaide Street West

311 is a critical part of the City’s customer service process, but it’s only as effective the divisions that are able to respond quickly and transparently. Residents don’t experience the City as separate divisions— they experience the City of Toronto as one government.

A strong front-end service is not helpful if complaints are met with repeated delays, weak enforcement, unclear responsibility, repeated extensions, and no meaningful resolution. Whether the issue is noise, potholes, snow clearing, property standards, or animal services, trust in the City is lost when residents must repeatedly call 311 without results.

This is especially true with regard to the thousands of Noise Bylaw complaints filed with 311— where residents begin the complaint process already frustrated by excessive and disruptive noise.

### **Case Study: St. Felix Centre – 629 Adelaide Street West**

The St. Felix Centre shelter at 629 Adelaide Street West obtained multiple City-approved building permits, including an HVAC permit, for its conversion into a 50-bed, 24-hour emergency shelter. Toronto Shelter and Support Services (TSSS), which fully funds the shelter, confirmed to residents that the HVAC system had been approved by the City.

New mechanical equipment was installed on to the rooftop (a two story building) including a large commercial rooftop HVAC unit installed on February 6, 2025. Residents immediately raised concerns with the General Manager of TSSS responsible for shelter standards and shelter design and technical guidelines, asking what noise mitigation measures would be implemented. No response was received. The new shelter opened gradually starting on July 21, 2025.

By September 2025, the rooftop equipment created a constant low-frequency hum and drone that significantly impacted nearby homes, bedrooms, and living spaces. Residents described the noise an inhumane hum and drone disruptive to daily life, sleep, and health.

A formal 311 complaint was filed on **September 18, 2025** and referred to Municipal Licensing and Standards (ML&S). After testing, an Order to Comply was issued on **October 30, 2025** to both St. Felix Centre and the building owner. However, more than six months later, residents are still waiting for meaningful noise mitigation. Multiple deadlines for mitigation were promised by TSSS General Manager, but repeatedly extended with no financial penalties:

- December 5
- within 120 days
- April 4
- May 1
- now July 1 (there was a requested extension to September 1)

Despite dozens of emails and ongoing follow-up, enforcement is weak and inconsistent. Residents wear noise-cancelling headphones in part of their own homes while waiting for basic peace and quiet.

This demonstrates a larger systemic problem: 311 can only succeed when the divisions behind it are accountable and effective.

## **Key Issues Identified**

### **1. Noise mitigation is not required at the permit stage**

Large rooftop HVAC systems can create persistent low-frequency humming, vibration, pressure, and droning that travel differently than typical noise and severely affect nearby homes. Yet these impacts are not properly assessed before permits are approved.

### **2. The system is reactive instead of preventative**

As acknowledged by ML&S staff, rooftop mechanical equipment is often not mitigated for noise because of cost. Residents are faced with the burden to file noise complaints to 311, rather than the noise being prevented through proper planning and permit review.

### **3. Existing Noise Bylaw standards are inadequate**

Current enforcement standards do not properly reflect the unique impacts of stationary rooftop mechanical systems, especially when placed only metres from homes and bedrooms.

### **4. Repeated compliance extensions undermine enforcement**

Once an Order to Comply is issued, repeated extensions weaken public confidence and, again, place the burden entirely on residents.

### **5. Lack of accountability between City divisions**

Residents are left navigating unclear responsibilities between ML&S, TSSS, St. Felix Centre, and the property owner. There is no single accountable lead, and information shared with residents is incomplete and inconsistent.

## **Recommendations**

1. **Make professional acoustical review mandatory** with proactive noise mitigation before permits are approved for rooftop mechanical equipment.
2. **Strengthen siting requirements** so rooftop equipment is placed farther from residential homes, with mandatory sound barriers, vibration isolation, acoustic shielding, and screening.
3. **Improve the Noise Bylaw** to better address low-frequency mechanical noise, vibration, pressure, hum, drone, and health impacts caused by rooftop mechanical equipment and commercial HVAC systems. These noise characteristics are very different than ambient noise especially when sited directly beside homes and bedrooms.
4. **Limit compliance extensions** after an Order to Comply is issued so they are granted only in very exceptional circumstances.
5. **Introduce automatic escalating financial penalties** for non-compliance to create real incentive for a timely resolution.
6. **Establish one accountable City lead** for complex complaints involving multiple divisions, ensuring transparency and consistent communication.

7. **Strengthen 311 by strengthening the divisions behind it**—without strong enforcement, accountability, and resolution, 311 cannot succeed.

## **Final Points**

No neighbourhood should have to fight this hard for basic peace and quiet.

The complaint at 629 Adelaide Street West was foreseeable and preventable. Instead, the burden has fallen entirely on residents through months of stress, disruption, repeated 311 calls, and failed enforcement.

311 is only as effective as the divisions responsible for resolving complaints. When those divisions fail, residents do not see separate departments—they see a City that is not working.

I fully endorse the recommendations being brought forward NoMoreNoiseTO to improve the 311 front-end process to file Noise Bylaw complaints.

Thank you,

Diane Chester

Neighbour of St. Felix Centre 24-Hour Emergency Shelter at 629 Adelaide Street West