

# City of Columbus

## Internal Decision Brief

### Urban Deer Management Options (Clintonville Pilot Focus)

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**To:** Columbus City Council, Columbus Department of Neighborhoods

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**Date:** February 16, 2026

**Subject:** Urban deer management options for Columbus (Clintonville pilot focus)

**Status:** Working draft

**Version:** v1.0

**Confidentiality:** Internal working document (not for public distribution)

**Prepared with input from:** Ohio Department of Natural Resources, Division of Wildlife; City legislative research

**Informed by:** Background research and issue framing compiled through ENR 4900.01 Capstone (Fall 2025)

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#### **Attachments:**

- Administrative Setup Sheet: Deer Management Program Owner and Wildlife Lead
- Administrative Setup Sheet: Deer Management Warrants
- Implementation Note: Targeted Deer Removal Program
- Implementation Note: No-Feed Ordinance
- Legal review intake sheet

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## Executive Summary

This brief summarizes feasibility, legal considerations, implementation requirements, and likely public questions for deer management options under discussion in Columbus. The near-term focus is a pilot in Clintonville. It is intended to support internal decision-making and readiness and may be updated as operational and legal choices are finalized.

## Near-term decisions and preconditions

- Assign a single internal program lead with written responsibility for coordination, documentation, monitoring oversight, and reporting.
- Confirm the pilot objectives and evaluation approach, including the minimum data set the City will track and what will constitute success.
- Establish a warrant structure that defines when staff review and escalate City action in a defined area, and what actions correspond to each escalation level.
- Confirm internal and external reporting expectations, including cadence, content boundaries, and who approves public-facing updates.
- Select the pilot approach and confirm the legal pathway required to operate it within Columbus.
- If the pilot reduces deer density, identify what a sustainment approach would require, including staffing, monitoring, and ongoing implementation capacity.

## Administrative and governance preconditions

Administrative readiness is a requirement for a successful pilot. Two items need to be settled early: program ownership with clear decision authority, and a warrant structure for when the City escalates action in a specific area. Additional detail is provided in the Administrative and governance preconditions section and the two administrative setup sheets.

## Summary of methods

- A no-feed ordinance can reduce congregation and conflict. It will not reduce the deer population.
- Ohio communities that reduce deer populations generally rely on lethal control. The approaches most relevant here are targeted removal by qualified professionals and controlled archery programs.
- Relocation, sterilization, and immunocontraceptive birth control are not practical tools for reducing a free-ranging deer population at the scale Columbus would require.
- The legal pathway in Columbus will shape feasibility because local code restrictions related to projectile weapons and firearm discharge affect where and how methods can be used.
- Worthington is the closest Ohio comparator for program structure, transparency choices, and anticipated public response.

## Scope and limitations

- This brief supports internal decision-making. It does not direct staff to implement a program.
- Population modeling is outside scope and would require separate scoping.
- Survey results are used to anticipate public questions and inform communications. They should not be interpreted as a mandate for any specific action.
- Legal interpretations should be confirmed by the City Attorney's Office before operational planning proceeds.

## Working assumptions

- The pilot location is Clintonville.
- Any expansion beyond the pilot would be a separate decision following evaluation.

## **How to use this brief**

This brief is organized to support a near-term decision on a Clintonville pilot and to clarify what the City would need in place to implement and evaluate that pilot. The methods comparison table provides a high-level view of options and feasibility. The Administrative and governance preconditions section describes the minimum internal setup needed for a pilot that is consistent across neighborhoods and defensible in public. The method sections provide deeper detail on feasibility, legal considerations, operational requirements, and anticipated public questions.

This brief is accompanied by supporting resources intended to make next steps more concrete once the City confirms its direction. These include the two administrative setup sheets and additional implementation and intake materials referenced within the method sections. These supporting documents are provided as practical tools for staff and are not intended to substitute for City legal review or operational decision-making.

## Method Comparison Table

*Survey results show respondent comfort with approaches as described in the survey. They are not a vote and do not determine feasibility.*

Method	Primary purpose	Effect on population	Time to see results	Fit for Clintonville pilot	City staffing and admin burden	Legal and policy dependencies	Operational risks	Public perception (survey results: support / oppose / no opinion)	Notes and prerequisites
Firearms (professional targeted removal by contracted sharpshooters)	Reduce population in a defined area	High impact if sustained and well-run	Weeks to months	Pilot-ready (City-controlled land)	High (vendor oversight, comms, monitoring, reporting)	Permitting pathway and discharge restrictions; City Attorney review	Safety, operational complexity, contractor selection, transparency disputes	<b>Citywide:</b> 57 / 38 / 5 <b>Clintonville:</b> 62 / 34 / 4 <b>Outside Clintonville:</b> 48 / 47 / 5	Needs clear site selection, safety plan, carcass handling plan, and a reporting framework
Archery hunting (permitted individual hunters on designated private properties)	Sustainment and shared responsibility	Variable, depends on uptake and property configuration	Months to seasons	Later-phase option (voluntary private properties)	Moderate (permit intake, verification, reporting, enforcement coordination)	Permit standards, enforcement approach, and City code alignment	Uneven participation, neighbor conflict, safety perceptions	<b>Citywide:</b> 62 / 34 / 5 <b>Clintonville:</b> 64 / 31 / 5 <b>Outside Clintonville:</b> 56 / 40 / 4	Needs transparent standards and a strict application process; contiguous parcels may be considered
No-feed ordinance (complaint-based enforcement)	Reduce congregation, conflict, and risk	Low impact on population by itself	Immediate (conflict reduction); minimal population change	Supporting measure (conflict reduction)	Moderate (complaint intake, outreach, staff training)	Ordinance definitions and enforcement design	Variable enforcement burden, neighbor disputes	<b>Citywide:</b> 79 / 13 / 8 <b>Clintonville:</b> 83 / 9 / 7 <b>Outside Clintonville:</b> 69 / 20 / 11	Works best with education-first outreach and a clear escalation process
Relocation	Remove deer without lethal control	Not viable in this context	Not applicable	Not available in Ohio (not allowed)	Not applicable	Not applicable	High regulatory and animal welfare constraints	<i>Not asked as a support/oppose item in this survey report.</i>	Not applicable
Sterilization	Limit reproduction	Low impact in open populations at city scale	Years	Not feasible as a City program (research-only)	High	Nuisance-deer immobilization requires euthanasia; research permit only	High cost, limited effectiveness, intensive logistics	<b>Citywide:</b> 59 / 30 / 11 <b>Clintonville:</b> 64 / 26 / 10 <b>Outside Clintonville:</b> 50 / 38 / 12	Not applicable
Birth control (fertility control vaccine)	Limit reproduction	Low to moderate in closed, managed populations	Years	Not feasible as a City program (research-only)	High	Research-only in practice; ODNR approval required	Delivery limits, repeat dosing, long timeline	<b>Citywide:</b> 54 / 35 / 11 <b>Clintonville:</b> 57 / 31 / 12 <b>Outside Clintonville:</b> 45 / 44 / 11	Not applicable

## **Administrative and governance preconditions**

Long-term deer management depends on more than selecting an appropriate method. The City will need clear administrative ownership and a workable governance structure to coordinate across departments, track conditions over time, and document the basis for decisions in a way that is consistent across neighborhoods. Even a limited pilot requires a named internal lead, defined decision authority, and a clear framework for when the City escalates action in specific areas.

### **Precondition 1: Program ownership and designated internal lead**

Assign a single program owner with written responsibility for coordination, documentation, monitoring oversight, and internal reporting. The role needs authority to coordinate with Recreation and Parks. It also needs authority to coordinate with Columbus Public Health, Police, Communications, and the City Attorney's Office. Placement can be within Recreation and Parks or Columbus Public Health. The location matters less than clear assignment and continuity across seasons. Decision authority must be explicit. City leadership should specify whether the program owner is a coordinator role or has delegated authority to approve escalation between warrant levels.

Define the role as a formal duty or position. If Council wants long-term capacity, a dedicated wildlife manager or natural resources role is the most stable option.

Before operational planning proceeds, confirm the minimum internal structure. Set up a cross-department working group with named representatives. Set up intake and routing from 311 to the owning department. Assign a tracking tool for warrants and decisions. Confirm ODNR coordination for permits and reporting. Set a standard reporting package for internal updates and Council updates.

*See Administrative Setup Sheet: Deer Management Program Owner and Wildlife Lead.*

### **Precondition 2: Warrant structure for location-specific action**

Adopt a warrant structure that sets a consistent screen for when staff review, escalate, and document City action related to deer in specific areas. This approach supports equity across neighborhoods by reducing reliance on complaint volume alone. It also creates a written basis for escalation, which is important when actions differ by location.

The warrant structure should be rate-based and tied to a defined geographic unit. Include a persistence rule. Define severity indicators. Include an exception pathway for documented safety concerns. Set a recurring review meeting with decision logging.

To make the warrant structure usable, staff will need to define the data sources. They will also need to define the warrant measure. Set a baseline approach that accounts for seasonality. Set data quality rules for 311 categorization. Define what is reported internally. Define what is shared externally. Confirm how public records requests will be handled for the warrant dashboard and the decision log.

*See Administrative Setup Sheet: Deer Management Warrants.*

### **Recommended condition: Regional coordination**

Consider convening a regional accord with adjacent communities and park jurisdictions that experience overlapping deer impacts. A regional accord can support consistent public messaging, shared learning on implementation, and longer-term alignment on approaches that cross municipal boundaries.

A practical first step is a mayor-to-mayor convening among adjacent jurisdictions. Another option is to use an existing Central Ohio association of mayors or city managers, if participation is strong. The City can also host an initial meeting. ODNR may be able to host an initial convening if the City identifies the jurisdictions and the desired agenda.

Regional coordination can help reduce duplication and improve success over time.

## Feasible and Recommended Methods Briefs

### Method brief: No-feed ordinance (prohibiting intentional feeding of deer)

**Feasibility:** Feasible

**Role in the overall strategy:** Recommended early action and supporting measure (with clear expectations)

A no-feed ordinance makes it unlawful to intentionally feed deer within city limits. Most ordinances define feeding broadly to cover placing grain, produce, salt or mineral blocks, or other attractants outdoors in a way that deer can access.

This is one of the few steps the City can take quickly that addresses a known conflict driver. It will not reduce the deer population by itself. In practice, the impact is localized and uneven. Where intentional feeding is occurring and the City can verify and follow up, a no-feed ordinance can reduce congregation at those specific sites and help limit habituation. In areas where feeding is hard to confirm or complaints do not come in, the ordinance functions more as a clear standard and a consistent message than as an enforcement-heavy tool.

#### *Intended outcomes:*

- Provide a clear standard when feeding contributes to safety concerns (traffic risk, habituated deer, repeat complaints).
- Reduce congregation at specific feeding hotspots when complaints are verified and the City follows through.
- Support consistent public messaging about behaviors that increase risk and conflict.

#### *Limitations:*

- It will not materially lower the deer population on its own in an open system like Clintonville.
- It will not be enforced uniformly, and outcomes will vary depending on verification, follow-through, and willingness to report.

#### *Contingencies:*

- The ordinance must be written with clear definitions and exemptions so it does not accidentally sweep in normal activities (bird feeders, gardens, landscaping, compost).
- Enforcement must match City capacity. A complaint-based, education-first model with escalation for repeat issues is the most realistic.
- Someone must own intake, follow-up, documentation, and basic tracking so staff are not improvising case by case.

### Common community-member questions and response points (for Council/staff use)

- *“Are you banning bird feeders?”* No. The ordinance is aimed at intentional deer feeding. Standard exemptions can clarify that typical bird feeders, gardens, landscaping, and compost are not the target.

- *“How will this be enforced and who responds?”* In practice it works as complaint-based enforcement with education first and escalation for repeat issues. The City should assign one department to own intake and follow-up.
- *“How do you prove someone is feeding deer?”* The City cannot litigate every report. Staff verify when feasible and focus on repeat situations where feeding is causing congregation or safety concerns.
- *“Will this fix the deer problem?”* No. It can reduce feeding-related hotspots and support safety and consistent messaging, but it does not reduce deer numbers on its own.
- *“What happens on the first complaint?”* Education and a written warning first, then escalation if the behavior continues.

**If Council wants to pursue this option, the City needs to decide:**

1. Scope: deer-specific or broader wildlife feeding restrictions.
2. Enforcement model: complaint-based, education-first with escalation for repeat issues.
3. Ownership: which department owns intake, outreach, and enforcement follow-up.

Once those are set, staff can draft ordinance language and a short implementation plan.

*See: Implementation Note: No-feed ordinance (prohibiting intentional feeding of deer)*

## **Method brief: Firearms-based targeted removal (qualified professionals)**

**Feasibility:** Conditionally feasible. Dependencies on a clear legal pathway, ODNR alignment, and site-specific safety design.

**Role in the overall strategy:** Primary near-term population reduction tool for the Clintonville pilot

Firearms-based targeted removal is a planned operation where qualified professionals remove a defined number of deer from defined locations under a written safety and operations plan. In municipal settings, it is usually scheduled when the area can be controlled and there is little to no public presence nearby. If Columbus pursues this, it will need city-selected sites in Clintonville that can meet conservative safety criteria and a clear legal pathway that matches ODNR requirements.

### *Intended outcomes:*

- Reduce deer numbers in the Clintonville pilot area on a short timeline when effort is sustained.
- Run a bounded pilot the city can evaluate honestly before deciding whether to repeat, expand, or shift methods.
- Create a clean record of what was done and what changed, so future decisions are not driven by anecdotes.

### *Limitations:*

- Results will be concentrated where the work occurs. It is not a citywide fix.
- A one-time effort can reduce numbers, but it will not hold on its own. If the city wants lasting change, it will need monitoring and a plan for what happens after the first season.
- Public reaction often turns on process more than biology. People focus on where, when, notice, and transparency. If those choices are unclear, the pilot can get defined by controversy rather than outcomes.

### *Contingencies:*

- The city needs to settle the legal pathway first. That includes how the work is authorized under city code, how discharge/projectile restrictions are handled, and how ODNR permits and reporting will work.
- Site selection is the make-or-break issue. Each site needs a site-specific safety plan that addresses backstops, buffers, access points, perimeter control, and stop-work triggers.
- One internal owner needs to be responsible for coordination, documentation, and follow-through. Without that, the work becomes fragmented fast.
- Carcass handling needs a decision up front: donation, disposal, transport, and what information is tracked and reported.

## **Common community-member questions and response points (for Council/staff use)**

- *“How will you keep people safe?”* Safety comes from conservative site selection, a written safety plan, controlled operating windows, and active access control. The operation pauses if conditions undermine control.

- *“Why these locations?”* Locations are chosen because they meet objective safety criteria. The city should be ready to explain the criteria even if it does not publish operational details.
- *“When will this happen?”* This is a policy choice. Council and staff should expect pressure for specifics. The city needs a consistent approach to notice and a clear line on what is shared publicly.
- *“Who is doing the work?”* ODNR strongly prefers USDA APHIS Wildlife Services. If Columbus uses USDA, the city can point to an established program with standard protocols.
- *“What happens to the deer?”* The answer depends on the city’s handling plan. This should not be decided midstream.
- *“Why not relocation or sterilization?”* Those options are not available or not workable as a municipal population management tool here.
- *“How will you report results?”* Commit to a basic cadence: what was done, what was removed, and what the city will evaluate next. Keep it factual.

**If Council wants to pursue this option, the City needs to decide:**

1. Who owns the program internally and who is accountable for coordination and reporting.
2. What legal pathway will be used and how ODNR permitting and reporting will be handled.
3. Whether USDA APHIS Wildlife Services is the preferred operator approach for the pilot.
4. How sites will be selected within Clintonville and what the minimum safety screen is.
5. What the transparency approach will be for location and timing.
6. What the carcass handling plan is and what gets documented and reported.

*See: Implementation Note: Targeted Deer Removal Program (adapted checklist from Geoff Westerfield ODNR-DW for Columbus context);*

## **Method brief: Archery hunting on private property (City-permitted program)**

**Feasibility:** Conditionally feasible. Depends on (1) a clear Columbus legal pathway, (2) safety standards that can be defined, administered, and enforced, and (3) Council willingness to authorize and sustain a City-permitted program.

**Role in the overall strategy:** Potential future complementary tool that shares responsibility with willing property owners; not a first move unless Council is prepared for the operational and political load.

A City-permitted private-property archery program authorizes screened hunters to remove deer on specific private parcels that the City reviews and approves. The City sets the eligibility rules, reviews applications, defines where hunting is allowed on each parcel, and requires reporting. Participation is voluntary and typically uneven, so results vary by neighborhood and season. This option is limited to approved private parcels under a City permit and does not authorize hunting on City land.

Division of Wildlife staff often recommend this approach because it makes the City's expectations explicit and gives residents a clear "yes/no" pathway. It can also help Council respond to constituent concerns when there are reports of private hunting activity by giving the City a clear standard to point to and a clear line between permitted and unpermitted activity.

### *Intended outcomes:*

- Provide a City-defined pathway for private-property archery where safety standards can be met.
- Share responsibility with property owners who are willing to participate under strict requirements.
- Create a clear distinction between City-authorized activity and unpermitted activity.
- Generate basic reporting that lets the City summarize participation and outcomes each season.

### *Limitations:*

- Population impact is variable and depends on uptake, parcel configuration, and sustained participation.
- Administrative lift is substantial (applications, verification, mapping, enforcement follow-up).
- Safety and public confidence can become the central issue. Even a tightly scoped program may draw outsized attention if residents perceive it as unpredictable activity in a dense neighborhood.
- If Columbus sets safety thresholds based on dense urban conditions, few sites may qualify. That is a plausible result and should be treated as such up front.

### *Contingencies:*

- The City needs standards that can be applied consistently, with a documented basis for approvals and denials.
- The City needs a credible compliance posture, including the ability to revoke permits quickly.
- Police and the program owner need an agreed response plan for wounded-deer situations and boundary issues.
- The City needs simple, repeatable reporting requirements so staff are not improvising.

### **Minimum program elements** (illustrative examples from the Mentor, OH)

These are concrete features used in Mentor’s packet that illustrate what “strict requirements” can look like in practice. Columbus can adopt, adapt, or exceed these elements based on legal review and local conditions.

- Written permit and annual renewal: a defined application process, season dates, and an annual permit term.
- Parcel eligibility requirements: minimum acreage thresholds and a defined “hunting area” on the parcel that is subject to City approval.
- Setbacks and “no-shoot” limits: required distances from property lines, roads, and other sensitive edges; clear restrictions on shot direction and safe zones.
- Elevated-stand requirement: hunting conducted from tree stands to manage arrow trajectory and reduce risk.
- Proficiency requirement: documented archery proficiency testing with specific expectations before a permit is issued.
- Documentation package: required copies of state hunting license and deer permits, plus signed program agreements and waivers as part of the local permit file.
- Clear reporting rules: required harvest reporting within a short window and basic information fields the City can audit.
- Wounded-deer protocol: explicit notification expectations (including when police are contacted), and rules for tracking and retrieval when a deer leaves the parcel.
- Revocation authority: clear grounds for permit revocation and an expectation that violations end participation.
- Map and boundary clarity: City-approved maps for each permitted site, with boundaries that can be explained to neighbors and enforced in the field.

### **Questions Council should expect if this option is discussed (response points)**

- *“Is the City proposing this citywide?”* No. If Council chose to explore a permitted program, it would apply only to approved parcels that meet the City’s safety standards.
- *“How would safety be handled in dense neighborhoods?”* A program would need parcel eligibility rules, setbacks, stand requirements, and hunter screening.
- *“Who would be allowed to participate?”* Only hunters who meet the City’s permit requirements and provide the required documentation.
- *“What would happen if someone violates program rules?”* A program would need clear enforcement consequences, including permit revocation and penalties for violations.
- *“What if a deer is wounded or leaves the property?”* A program would need a written tracking, notification, and retrieval protocol.
- *“Why not run an archery program in City parks?”* In dense urban parks, a City-run archery program would require strict site eligibility rules, formal closures and enforcement capacity, and ongoing administration. For Columbus, ODNR staff have emphasized private-property permitted archery as the more workable archery model if the City ever wants an archery component, because it keeps participation limited to approved parcels that can meet setback and safety requirements.

**If Council wants to pursue this option, the City needs to decide:**

1. Whether this is being offered as a complement to targeted removal or as a standalone program.
2. Whether the City is willing to administer a full permit program, including verification and revocation.
3. The safety thresholds Columbus will require for parcel eligibility and setbacks.
4. Which department owns the program and what role police play in reporting and response.

See: [Reference example, City of Mentor Deer Hunting Permit Packet \(2025–2026\)](#).

## **Non-Feasible, Not Recommended Methods Briefs**

### **Method Brief: Capture and relocation (moving deer to another location)**

**Feasibility:** Not feasible at municipal scale in Ohio

**Recommendation:** Not recommended

Capture and relocation would involve trapping deer (drop nets or box traps), transporting them, and releasing them at another location.

Relocation is often raised as a humane alternative. In Ohio, it is not set up as a practical option for free-ranging urban deer because the legal pathway is narrow and the handling requirements work against transport-and-release.

#### **Legal and regulatory constraints in Ohio:**

- Release elsewhere requires ODNR written permission. Ohio Administrative Code 1501:31-15-02 makes it unlawful to release a deer in Ohio without written permission from the Chief of the Division of Wildlife, with a narrow exception related to release within a licensed wild animal hunting preserve. That means relocation is not something a city can treat as a routine operational approach.
- Chemical immobilization does not support relocation under nuisance-deer control. Ohio Administrative Code 1501:31-15-03 states that nuisance white-tailed deer immobilized with chemicals or drugs will be euthanized. This closes off the most common transport approach (dart/immobilize and move).
- ODNR's nuisance-deer framework is oriented around permitted removal, not relocation. In practice, ODNR's nuisance-deer permitting pathway is built around authorized take under permit with reporting requirements, rather than transport-and-release.

#### **If asked "Why can't we relocate them?"**

Ohio rules do not support relocation as a routine municipal option. Releasing deer elsewhere requires written permission from ODNR, and chemically immobilized nuisance deer must be euthanized under Ohio's nuisance-deer rule.

## **Method Brief: Surgical sterilization (fertility control through surgery)**

**Feasibility:** Not feasible at municipal scale in Columbus

**Recommendation:** Not recommended

Sterilization programs typically involve capturing and anesthetizing female deer, performing surgery (often ovariectomy), tagging the animal, and releasing it back into the capture area.

This approach is labor-intensive and depends on repeated handling of a very large share of does over multiple seasons. Ohio's nuisance-deer handling rules also create a hard barrier to a routine capture–treat–release program.

### **Legal and regulatory constraints in Ohio**

- Chemical immobilization under nuisance-deer control leads to euthanasia. Ohio Administrative Code 1501:31-15-03 states that nuisance white-tailed deer immobilized with chemicals or drugs will be euthanized. That is incompatible with a sterilize-and-release approach under the nuisance-deer control framework.
- A research pathway would be the only plausible way to explore fertility control. In Ohio practice, deer fertility control is treated as research activity rather than a standard municipal deer management tool. It requires ODNR approval and ongoing reporting, and it is not something a city can plan as a routine program on a normal implementation timeline.

### **Operational constraints**

- Open population dynamics mean that in a connected urban landscape, untreated deer will move into the area. That dilutes any fertility-control effect unless treatment coverage is extremely high and maintained.
- This method requires high effort per deer. Each treated doe requires capture, anesthesia, veterinary capacity, recovery monitoring, and long-term tracking.
- Sterilization reduces births. It does not reduce deer numbers quickly.

### **If asked “Why not sterilization?”**

Ohio's nuisance-deer rule requires euthanasia for chemically immobilized nuisance white-tailed deer, and fertility control is not set up as a standard municipal management tool. Any pathway would look more like a research project than an operational city program.

## **Method Brief: Birth control / immunocontraception (fertility control vaccines)**

**Feasibility:** Not feasible at municipal scale in Columbus

**Recommendation:** Not recommended

Immunocontraception is a fertility-control vaccine (often discussed as PZP or similar approaches). It requires identifying individual does, delivering doses (often by dart), and repeating doses to maintain effectiveness.

This option is frequently raised because it sounds like a nonlethal alternative. Ohio law does not provide a routine contraception pathway for deer under nuisance wildlife control, and the delivery requirements are not a good match for a free-ranging urban herd.

### **Legal and regulatory constraints in Ohio**

- Contraceptive chemicals are not authorized for deer under nuisance-wildlife control. Ohio Administrative Code 1501:31-15-03 explicitly notes lawful contraceptive chemical use for controlling populations of common pigeons and rats. Outside that narrow allowance, the nuisance-wildlife framework does not treat contraceptive chemicals as a lawful population-control tool for nuisance wild animals such as deer.
- A research pathway is the only plausible way this is discussed in Ohio practice. When deer contraception is pursued, it is positioned as research activity with ODNR approval and ongoing reporting expectations, not as a near-term municipal management approach.

### **Operational constraints**

- This methods requires repeat dosing and tracking. Ongoing boosters and identification are part of most real-world programs.
- Population-level effect depends on treating a very high share of does consistently over time.
- Darting requires predictable access, controlled conditions, and reliable re-contact with the same animals.

### **If asked “Why don’t we use birth control instead?”**

Ohio’s nuisance wildlife framework does not provide contraception as a standard tool for deer. In Ohio practice, it is treated as research activity rather than a municipal management option. Even where researched, it depends on repeated treatment of a large share of does over multiple years.

# Administrative Setup Sheet:

## Deer Management Program Owner and Wildlife Lead

### Purpose

Assign a single program owner for deer management and establish the minimum coordination and reporting structure needed to run a pilot.

### Rationale

Deer management requires continuity across multiple seasons, clear documentation, and consistent coordination across departments. Assigning a named program owner reduces handoffs, prevents gaps in reporting, and supports accountability for decisions and outcomes.

Setup item	Assigned owner	Deliverable	Includes
Name the program owner	Mayor's Office or relevant Director	Signed designation memo naming the owner and department	Single point of accountability for deer management program coordination
Define the role as an assigned duty or position	Department Director and HR	Job duties addendum or position description	Clear responsibility for the deer program (not an informal task)
Assign authority for cross-department coordination	Mayor's Office with Department Directors and City Attorney	One-page authority statement attached to designation	Ability to convene Parks, Public Health, Police, Communications, Legal, Budget/Finance as needed
Decision authority for escalation and program actions	Program owner with sign-off by relevant Director	One-page decision authority map	States whether the program owner routes work or holds decision authority for escalation, or both, and under what conditions
Set up the internal working group	Program owner	Roster and meeting schedule	Named representatives and meeting frequency. Identify who logs decisions and where they are stored. Likely representation includes Parks operations, Public Health animal functions, Police liaison, Communications, Legal, and Procurement.
Establish ODNR coordination	Program owner	Named ODNR contact and coordination plan	Identify the ODNR point of contact for permit and reporting questions. Confirm required reporting elements and timing for the selected method. Confirm documentation expectations during the pilot period.
Establish procurement and vendor oversight approach	Program owner and Procurement	Contract manager assignment and contract reporting template	Vendor scope and performance checks. Documentation requirements for issues and changes. Defined vendor deliverables and required documentation.
Set up intake and triage	Program owner and 311 Customer Service Center lead	One-page routing map	What comes through 311 Customer Service Center, what routes to Parks, what routes to Police, what routes to Public Health
Establish field verification and site review process	Program owner, Parks operations lead	Field verification protocol	Who verifies, what gets recorded, how photos or site notes are stored

Setup item	Assigned owner	Deliverable	Includes
Tracking tool owner (warrants and program log)	Program owner	Named tracking tool and file location	Who updates it, update frequency, where decisions are logged
Establish safety and liability framework for field operations	Program owner with City Attorney and Police liaison	Written safety protocol with department sign-off	Site access rules. Coordination with Police. Vendor safety plan requirements. After-hours protocol.
Establish data ownership and record retention	Program owner with Department records lead (and City Attorney if needed)	Data and records plan	What gets stored. Where it is stored. Who maintains it. Public records handling.
Define communications lead and approval path	Program owner and Communications Director (or Communications lead)	Message approval workflow	Who drafts. Who clears. Who speaks publicly. Response to high-conflict events.
Define program measures and reporting fields	Program owner	Standard reporting template	Measures tracked. Reporting schedule. Required narrative fields.
Set the reporting package	Program owner and Mayor's Office	Standard internal update format	Frequency, required fields, who receives it
Set Council update expectations	Program owner and Mayor's Office	Council-facing update format	Cadence, content boundaries, who presents

### Placement and Duties

It would be appropriate for the program lead to be housed within either Recreation and Parks or Columbus Public Health. Both pathways can work if the role has clear authority, defined responsibilities, and continuity across seasons.

If housed within Recreation and Parks as a natural resources or wildlife manager, the City may draw on the parks-based model used in Mentor, Ohio, where a natural resources position includes direct support for deer management program functions. Example duties from that model include site inspections, public interaction related to deer activity, coordination with program participants where applicable, program data collection and documentation, tagging and tracking tasks, coordination of transport or handling of program outputs, and maintenance of program equipment and materials. This position could be parallel to existing natural resources/forestry staffing models within Columbus Recreation and Parks Department.

If housed within Public Health, the assigned duties should still include cross-department coordination, documentation, monitoring oversight, and program reporting, with defined coordination points for Parks and Police. If disease monitoring is included in the City's approach, Public Health may be a logical home for coordinating that work.

In either placement, the City should specify the assigned duties in writing and identify the single accountable staff lead before operational planning proceeds.

# Administrative Setup Sheet:

## Deer Management Warrants

### Purpose

Establish a warrant structure for when staff review, escalate, and document City action related to deer in specific areas of the city.

### Basis

Columbus uses warrant analyses in traffic engineering to guide action while preserving staff judgment. Using a warrant structure would provide a consistent screen for when staff move from routine monitoring to targeted action in a defined area of the city. [Traffic signal warrants link.](#)

Setup item	Assigned owner	Deliverable	Includes
Define the warrant geography	Program owner	Pilot warrant map	Geographic unit used for warrants. Boundary source and update process. Population denominator source (City planning estimates, Census, or other adopted source). Geographic unit may be a neighborhood boundary, Area Commission area, planning area, or another City-defined unit.
Define the data sources	Program owner and 311 Customer Service Center	Data source list with definitions	Which 311 categories are included and excluded. How duplicate reports are treated. Secondary sources used for cross-checking (crash reports, Division of Refuse Collection dead animal pickup requests reported through 311, CRPD maintenance/service request logs, and CRPD staff field observations and Police observations where applicable). Specify whether reports are limited to CBUS 311 service requests or include calls, app submissions, and web submissions captured by the 311 Customer Service Center.
Data quality checks and audit process	Program owner and 311 Customer Service Center	Data QA rules	How miscoded calls are handled. How duplicates are identified. How changes to category definitions or filtering rules are recorded and dated.
Define the warrant measure	Program owner	One-page warrant measure definition	Define the numerator and denominator for the warrant rate. Specify the time window used for calculation (monthly or quarterly are typical). Confirm whether the rate is based on all deer-related reports or a defined subset.
Define baseline and normalization method	Program owner	Baseline definition note	Baseline period used for comparison. How seasonal patterns will be handled. Rationale for baseline choice.
Define warrant levels	Program owner and relevant Department Director(s)	Warrant level table	Define what each level means and what it triggers (monitoring, review, targeted response, management consideration). Confirm whether warrant levels are based on the warrant rate alone or require a persistence screen.
Define persistence	Program owner	Persistence rule	What sustained elevation looks like. Number of consecutive review cycles required. Conditions that reset the count.
Define severity indicators	Program owner with Parks and Police liaisons	Severity indicator list and documentation fields	List the severity indicators used to support escalation. Identify who can document them. Define the minimum documentation fields (date, location, source, and brief description). Examples may include documented safety

Setup item	Assigned owner	Deliverable	Includes
			concerns in parks, repeated roadway conflict locations, or documented impacts in high-use parks and City natural areas.
Exception process for documented safety concerns	Department Director	Exception protocol	Define when staff may escalate outside the warrant levels for a documented safety concern. Define documentation requirements and who approves the exception. Examples include repeated incidents in a park location or a pattern of roadway conflicts.
Map warrants to staff actions	Program owner	Response mapping table	Standard actions associated with each warrant level. Items requiring leadership sign-off.
Define escalation authority	Relevant Department Director, with Mayor's Office review as needed	Escalation sign-off protocol	Who authorizes movement between warrant levels. Who authorizes initiation of management planning activities.
Equity review step for complaint-driven measures	Program owner with Mayor's Office	Equity review note (one page)	How staff interpret areas with low reporting volume. Whether outreach, partner input, or field observations are used to avoid relying on complaints alone.
Set review schedule	Program owner	Calendar schedule and agenda template	Program owner, 311 Customer Service Center, CRPD liaison, Police liaison, Department communications lead (with Mayor's Office communications as needed), and City Attorney's Office as needed. Review the warrant dashboard and any documented severity indicators. Log decisions and rationale. Confirm where the warrant dashboard and decision log are stored as the record copy.
Define reporting	Program owner with Mayor's Office communications as needed	Internal and Council update templates	What is reported, what is not reported, and schedule of reporting. Identify the internal recipients and the Council update pathway. Internal recipients may include Department leadership and the Mayor's Office.
Public records and external reporting boundaries	Program owner and City Attorney	Records and disclosure guidance	What warrant dashboards and decision logs are retained. What is shared externally. How sensitive locations are handled. Confirm handling for public records requests related to the warrant dashboard and decision log.

# Implementation Note: Targeted Deer Removal Program

Checklist for Starting a Targeted Deer Removal Program (Geoff Westerfield, original text) with Columbus notes added

Items tagged *[City decision]* require direction from the program owner and City administration.

## A. Program foundation

Determine if the municipality needs to make any municipal ordinance modifications to allow for the program.

### *Columbus notes*

- City Attorney review should identify the legal mechanism Columbus would use to authorize a site-specific operation on City-controlled land.
- City Attorney review should also confirm the authority needed for temporary closures and access control during operations.
- *Supporting document: Legal review intake sheet (firearms-based targeted deer removal)*, adapted as needed and sent to City Attorney's office.
- *[City decision]* Assign a single accountable program owner (department + role) and confirm supporting roles (Parks/operations, Police, Public Health, Communications, 311/service, data/reporting).

## B. Baseline and plan

While not required, it is highly suggested to do a deer population survey (usually conducted November-March). Some options to accomplish this include:

- A. USDA-Wildlife Services-Jeff Pelc, Jeff.S.Pelc@aphis.usda.gov (614)993-3444
- B. Davis Aviation- Larry Davis-(330) 554-4794, davisel@sprintmail.com (conducts aerial infrared surveys)
- C. Certified nuisance wildlife control company. Some that I know who focus on deer are:
  1. White Buffalo <https://www.whitebuffaloinc.org/deer-management> (860) 385-4725
  2. AD Wildlife Solutions, LLC-Scott Adams/Bryan Dawson, adwsllc@gmail.com, (216) 310-2943/(330) 647-5838
- D. Use a pilot that has a helicopter and utilize municipal staff to count the deer seen (Division of Wildlife can provide the necessary protocol for this survey; this survey method does require adequate snow depth)
- E. There are multiple private drone companies that can be contracted to do surveys.
- F. Use municipal staff (Division of Wildlife can help provide protocols):
  1. If your municipality has a drone/pilot capable of doing the survey you can utilize them to do the survey.

- A. Municipal staff (ex. animal control officer, public service staff, police staff) can conduct ground count surveys.

*Columbus notes*

- A baseline estimate helps the City set a removal target and explain it.
- If timing is tight, Columbus can proceed using existing indicators in the first operating season and schedule a formal survey in the next winter window.
- ODNR staff have indicated USDA APHIS Wildlife Services is the preferred partner for this type of work. Other vendors appear here because they are included in the checklist.

Develop a Deer Management Plan. The plan must be approved by the Division of Wildlife. Options for the creation of the Deer Management Plan include:

- A. Division of Wildlife can write the plan for the municipality (offered free of charge)
- B. Pay USDA-Wildlife Services-Jeff Pelc, Jeff.S.Pelc@aphis.usda.gov (614)993-3444
- C. Pay a certified nuisance wildlife control company. Some that I know who focus on deer are:
  1. White Buffalo <https://www.whitebuffaloinc.org/deer-management> (860) 385-4725
  2. AD Wildlife Solutions, LLC-Scott Adams/Bryan Dawson, adwsllc@gmail.com, (216) 310-2943/(330) 647-5838
- d. You designate someone on the municipal staff to write the plan.

*Columbus notes*

- The Plan should state that operations occur on City-controlled land selected by the City. Parks may be included, but this is not assumed.
- The Plan should spell out the site selection and approval steps, closure and access control approach, reporting fields and cadence, carcass handling and donation logistics, and stop-work authority.
- *[City decision]* Decide whether the Plan is written by ODNR, by USDA APHIS Wildlife Services, or internally with ODNR approval.

Ensure data collection protocols are in place as outlined in your Deer Management Plan. Typical data that is collected includes:

- A. Deer-vehicle accidents
- B. Dead deer picked up by Service Department
- C. Survey of residents/businesses that are experiencing deer issues within your municipality

*Columbus notes*

- *[City decision]* Identify the core indicators the City will rely on to set annual removal targets. A workable minimum is the list above plus a simple way to track complaint volume by area.
- *[City decision]* Decide where these data will live and who produces the annual summary for Council and ODNR.

### C. Delivery model and carcass handling

Determine who will do the targeted deer removal. Options include:

- A. Pay USDA-Wildlife Services-Jeff Pelc, Jeff.S.Pelc@aphis.usda.gov (614)993-3444
- B. Contract with a certified nuisance wildlife control company. Some that I know who focus on deer are:
  1. White Buffalo <https://www.whitebuffaloinc.org/deer-management> (860) 385-4725
  2. AD Wildlife Solutions, LLC-Scott Adams/Bryan Dawson, adwsllc@gmail.com, (216) 310-2943/(330) 647-5838
- C. Use of municipal staff. If suppressors will be used and your staff doesn't already have a license to use them:
  - Complete ATF application (may take a few months to receive license).
  - Purchase suppressors.
  - Purchase enough bait for the season.

#### *Columbus notes*

- Planning assumption for this brief: qualified professionals, with USDA APHIS Wildlife Services preferred; final operator selection remains a City decision.
- If the City considers municipal staff at any point, the suppressor and ATF steps above apply and should be treated as a separate staffing, training, and liability review.
- *[City decision]* Confirm operator and procurement approach within City requirements.

Determine what will be done with the deer after they are shot. Options are:

- A. Create a "call out" list where whole deer are given to a person (eliminates costs for butchering deer).
  1. Identify municipal staff person that will create/maintain a list of people willing to take a whole deer.
- B. Donate deer to a non-profit:
  1. Identify non-profit (ex. food pantry) that will accept deer once they are packaged by a deer processor.
  2. Identify, and enter into, a contract with a deer processor.

#### *Columbus notes*

- If Columbus uses a donation pathway, staff should confirm processor capacity, donation partner requirements, chain-of-custody documentation, and storage and transport logistics.
- *[City decision]* Decide whether donation is part of the operating model in the first operating season.
- *[City decision]* Decide whether the City coordinates donation logistics or requires the operator to manage them under City conditions.

#### **D. Site identification**

Identify shooting locations, the more shooting locations available equates to a more successful a program. Sites should include both public and private property locations.

##### *Columbus notes*

- Columbus framing for this brief: the City selects eligible City-controlled land. Parks may be included, but this is not assumed.
- A voluntary private-property component would require a separate City decision and a separate administrative design. It is not assumed here.
- *[City decision]* Define site screening criteria (buffers, backstop potential, access control feasibility, surrounding uses) and the site approval process.

#### **E. Annual cycle**

Your municipality will need to do the following annually:

Determine appropriate number of deer to be removed using the data collected as noted in monitoring indicators the city adopts in the deer management plan above and submit the annual request for how many deer you would like to remove using the supplied template from Division of Wildlife (due no later than 30 days prior to start of operations).

##### *Columbus notes*

- For Columbus, the “data collected” means the program monitoring indicators adopted in the Deer Management Plan, including deer-vehicle accidents, dead deer pickups by the Service Department, and survey or complaint inputs from residents and businesses.
- *[City decision]* Confirm who compiles the annual request and supporting summary, and who signs as the accountable program owner.

Conduct targeted deer removal operation (usually done from October through March).

##### *Columbus notes*

- *[City decision]* Confirm the earliest feasible operating season based on ODNR plan approval timing, contracting and procurement lead time, legal readiness, and site readiness for closure and access control.

Submit the annual end of operations report using supplied template from Division of Wildlife (due by May 1st).

*Columbus notes*

- *[City decision]* Decide the reporting cadence to Council and the public during the season and after the season, and which metrics will be routinely published.

Identify any needed modifications to the operational logistics noted above.

*Columbus notes*

- *[City decision]* Decide how the City will review results internally at the end of the season and how changes will be documented.

Ensure enough funds are allocated in your municipal budget to accomplish yearly targeted deer removals.

*Columbus notes*

- *[City decision]* Confirm the budget owner and cost centers. Typical cost centers include operator costs, closure and access control support (including any Police detail), communications workload, processing and donation logistics if included, and reporting support.

Determine your plan for communicating the program to your residents/businesses.

*Columbus notes*

- *[City decision]* Set the transparency posture for what is published in advance and during operations.
- *[City decision]* Assign message ownership, frontline scripts (311, Parks desks, Police non-emergency), and a routine update method for the operating window.

# Implementation Note: No-feed ordinance (prohibiting intentional feeding of deer)

A no-feed ordinance is best treated as a supporting measure. It can help address specific feeding-related hotspots and establish a clear community standard. It should not be presented as a population-reduction tool. In practice, this is enforced selectively and tends to work best when the City focuses on repeat, verifiable hotspots.

## Initial policy decisions

### *Scope*

- Deer-specific language is usually the cleanest approach and aligns with the current decision context.
- Broader “all wildlife” language can work, but it tends to create more edge cases and requires tighter definitions and exemptions.

### *Geography*

- Most Ohio examples are citywide.
- Targeted zones can be harder to explain and can lead to uneven expectations. If problems are concentrated in specific areas, a citywide ordinance with hotspot-focused outreach and follow-up is often simpler than a zone-based rule.

## Key areas for clarity

### *Definition of feeding*

- Use language that covers intentional feeding and placing attractants where deer can access them.
- Include examples that match common situations: produce piles, corn or grain, salt or mineral blocks, and commercially sold wildlife feed placed on the ground.

### *Exemptions*

Clear exemptions reduce confusion and help staff respond consistently. Common exemptions include:

- Bird feeders used as intended are typically exempt. If the City wants a safeguard, include a simple standard that addresses practices likely to attract deer.
- Gardens, landscaping, and standing crops (including ornamental plants and shrubs).
- Naturally growing materials and fallen fruit or nuts.
- Compost and mulch piles.
- Feeding domestic animals on the property, with specific limitations to prevent attractants from being left out in ways that draw deer.

### *Duty to remove or secure attractants*

- Include a practical requirement that, once notified, the property owner must remove the attractant or modify the situation so deer cannot access it.
- This gives staff a clear basis for follow-up without turning enforcement into arguments about intent.

### *Official duties and program exceptions*

- Include standard exceptions for law enforcement, public health staff, and state or federal wildlife officials acting within their duties.
- Allow written authorization for feeding that is part of an approved deer management program, if needed.

## **Enforcement approach**

Complaint-based enforcement is the most realistic and common model. It should be designed to address repeat, verified cases instead of trying to capture every instance.

### *Escalation*

- First contact: education and written warning
- Second contact: citation
- Repeat violations: escalation consistent with City code; if Council wants a stronger tool, include language that treats each day as a separate offense, paired with internal guidance on when to use it.

### *Enforcement focus*

- Prioritize intentional attractants and repeat situations where congregation is linked to feeding.
- Avoid trying to police routine landscaping or normal bird feeding.
- If staff cannot verify a violation, the appropriate response may be education and documentation, rather than escalation.

## **Intake and response process**

### *Intake*

- Use 311 and an online submission option with a consistent category/tag.
- Collect only what staff will use: location, description, timing, and whether deer are congregating.

### *Triage*

Prioritize cases tied to:

- repeat complaints at the same location
- traffic or public safety concerns
- habituated deer behavior
- locations where staff can reasonably verify conditions

### *Response*

- Use a consistent first-contact approach that is practical and specific about what needs to change.
- Provide a short written leave-behind that explains: what counts as feeding, what is generally allowed, what the next step is if behavior continues.

### *Documentation and tracking*

- Document date, location, brief notes, action taken, and repeat status.
- Use photos when appropriate for staff records.
- Avoid placing the burden on residents to document or “prove” violations. Staff documentation should support the process.

## **Public communication materials**

Public materials should set expectations and avoid overpromising.

### *Recommended minimum materials*

- Short explanation of why feeding creates problems--congregation, habituation, traffic risk, neighborhood conflict, etc.
- “Counts as feeding” examples
- “What’s allowed” list aligned to the ordinance exemptions
- “What to do instead” tips (securing attractants, basic fencing, repellents, deer-resistant planting guidance)

Add credibility by including ODNR reference or link and align the language with ODNR guidance:

[ODNR: Responsible Feeding & Baiting of Wildlife](#)

[ODNR: General Prevention of Nuisance Wildlife](#)

## **Roles and training**

### *Ownership*

- Assign one department to own the process end-to-end (intake, follow-up, documentation, escalation).
- If multiple departments are involved, define handoffs clearly so complaints do not stall.

### *Training*

Training should cover:

- ordinance intent and common exemptions
- first-contact messaging
- documentation expectations
- when escalation is appropriate
- how to handle neighbor conflict during complaint-based enforcement

*Reporting back to Council*

Keep reporting simple:

- complaints, warnings, and citations by month
- repeat locations (hotspots)
- targeted outreach efforts taken

These should be framed as indicators of hotspot activity and follow-through, not as measures of deer population change.

## **Appendix: Examples of Ohio community no-feed ordinance text**

Below are the full code sections from the online codified ordinances pages for each city. Included for drafting reference; staff should confirm current codified language online.

### **Worthington (Codified Ordinances § 505.16)**

#### **“505.16 FEEDING OF DEER PROHIBITED.”**

##### (a) Feeding Deer Prohibited.

(1) No person shall purposely feed or make food available for consumption by deer on private or public property within the City.

(2) No person shall recklessly feed or make food available for consumption by deer on private or public property within the City.

##### (b) Definitions.

(1) For the purposes of this section, feeding or making food available for consumption shall include the act of placing or permitting to be placed on the ground, or within five feet of the ground, any device or any fruits, grains, minerals, plants, salt licks, vegetables, seeds, nuts, hay, or any other edible materials that may reasonably be expected to result in consumption by deer, unless such items are screened or otherwise protected from deer consumption.

(2) The presumption that the placement of any fruits, grains, minerals, plants, salt licks, vegetables, seeds, nuts, hay, or any other edible materials is for consumption by deer shall not apply to the following:

- A. Naturally growing materials, including but not limited to fruit, grain, nuts, seeds, hay, and vegetables.
- B. Planted materials growing in gardens and lawns, as ornamental plants, or shrubs, standing crops.
- C. Residue from lawns, gardens and other vegetable materials maintained as a compost or mulch pile.
- D. Unmodified, commercially purchased bird or squirrel feeders or their equivalent.

(c) Removal Required. Each property owner or person having control of the property shall have the duty to remove any device or materials placed on the owner's property in violation of this section. Alternatively, a property owner or person having control of the property may modify such a device or make other changes to the property that prevent deer from having access to the materials or feeding from the device.

##### (d) Exceptions to Prohibitions.

(1) The prohibitions in this section shall not apply to any health department employee, law enforcement officer, or state or federal game official acting within the scope of his or her official duties.

(2) The prohibitions in this section shall not apply to feeding that is authorized in writing by the City Manager on an emergency basis, or authorized as part of a deer management program.

##### (e) Violations.

(1) Any person who violates subsection (a)(1) of this section is guilty of a minor misdemeanor for the first offense. For the second and subsequent violations of subsection (a)(1), the violator shall be

deemed guilty of a misdemeanor of the fourth degree.

(2) Any person who violates subsection (a)(2) of this section is guilty of a minor misdemeanor.

(3) Each day that a violation continues shall be deemed a separate offense.

**Alliance (Codified Ordinances § 505.27)**

**“505.27 FEEDING OF DEER PROHIBITED.”**

(a) Definitions. In this Section, "food" means corn, fruit, oats, hay, wheat, alfalfa, salt or mineral blocks, grain, vegetables, human food scraps, commercially sold wildlife feed, birdseed, or livestock feed.

"Food" does not include shrubs, live crops, plants, flowers, vegetation, gardens, trees, and fruit or nuts that have fallen from trees to the ground.

(b) Feeding of Deer Prohibited. No person shall intentionally feed deer or make food available for consumption by deer on private or public property within the City of Alliance. A person shall be presumed to have intentionally fed deer, or made food available for consumption by deer, if the person places food or causes food to be placed on the ground or any alternative feed venue outdoors other than bird feeders.

(c) Affirmative Defense. It is an affirmative defense to prosecution under this section if a person places food, in good faith, for the purpose of feeding domestic animals owned and located on the involved property.

(d) Penalty. Whoever violates this section shall receive a warning on the first offense, and is guilty of a minor misdemeanor on subsequent offenses.

**Dublin (Codified Ordinances § 91.12)**

**“§ 91.12 OUTDOOR FEEDING PROHIBITED.”**

(A) Definitions. For purposes of this section, the following definitions shall apply unless the context clearly indicates or requires a different meaning.

FEED OR FEEDING. The act of or the furnishing of food or other sustenance.

RUNNING AT LARGE. An animal off its owner’s premises, without a leash, and without a person to control the animal.

WILD ANIMAL. An animal not legally confined, acquired, or held by private ownership. Examples include, but are not limited to: squirrels, chipmunks, ground hogs, raccoons, skunks, waterfowl, opossums, muskrats, deer, foxes, black bears, wild turkey, bobcats, and coyotes, but shall not include “companion animals” as defined in § 91.06.

(B) No person shall feed, cause to be fed or provide food for animals running at large or wild on any private or public property within the boundaries of the city. The feeding of one’s own animal(s) or wild birds on their premises shall be the exception so long as the feed does not attract animals running at large or wild from public property, public ways or private property not owned by the feeding person.

(C) Whoever violates this section is guilty of a minor misdemeanor. Each day that a violation continues shall be deemed a separate offense.

# Appendix: Legal review intake sheet (firearms-based targeted deer removal)

**Prepared for:** Columbus City Attorney's Office

**Subject:** Legal review needed for a potential firearms-based targeted deer removal program on City-controlled land using qualified professionals (USDA APHIS Wildlife Services preferred; final operator TBD)

## **Purpose**

Confirm the City's legal authority, constraints, and drafting requirements for authorizing a limited, site-specific targeted removal operation on City-controlled land.

## **Program frame (for legal analysis)**

A limited, site-specific operation conducted by qualified professionals under ODNR permissions and reporting requirements, under a written safety and operations plan with formal site closure and access control.

## **Legal questions for City Attorney review**

### *State law and ODNR authorization*

- Identify the ODNR authorization/permit pathway a municipal program would use and the legal conditions that attach (timing, methods, reporting, carcass handling, and any operational constraints ODNR requires).
- Confirm how ORC 2923.162 (discharge on or near prohibited premises) applies to a City-authorized operation at candidate locations, including any applicable exceptions or required conditions.

### *Columbus Code and City authority*

- Identify and cite the Columbus Code provisions that govern:
  - discharge/use of firearms on City-controlled land
  - firearms/weapons restrictions on City property, including parks and any specially designated areas
  - authority to close sites, limit access, post notice/signage, and enforce temporary closures
  - any special designations (including nature preserve provisions) that affect feasibility at candidate sites
- For each controlling local provision, provide a brief applicability note and what legal action is required to authorize the activity (for example: Council action, director authority, written designation, administrative rule, permit, or other instrument used by the City).

### *Preemption and drafting guardrails*

- Provide drafting guardrails related to ORC 9.68 and other relevant state constraints so the City's legal mechanism reads as site authorization and access/safety management, not a general weapons regulation.
- Identify any wording or structure to avoid in ordinances, resolutions, departmental rules, or public-facing descriptions that could increase litigation risk.

### *Contracting and liability terms (legal requirements)*

- Identify legal constraints and required terms for contracting with USDA APHIS Wildlife Services (preferred) and any alternative qualified operator the City may evaluate.
- Specify required insurance, indemnification, and liability terms for the operator and any subcontractors.
- Clarify legal requirements related to on-site authority and incident response, including:
  - who has legal authority to close/enforce closures at the site
  - how Police or other enforcement support should be structured from a legal standpoint
  - stop-work authority and how it should be defined contractually or in the authorization instrument

### *Public records and confidentiality of operational details*

- Provide public records guidance for operational details, including how the City should treat safety-sensitive information (specific dates/times, exact locations, operational tactics) and any legally supportable options for reducing risk while meeting disclosure obligations.

### *Carcass handling, processing, and donation (legal requirements)*

- Identify legal requirements and required agreements for carcass handling, processing, and donation if the City pursues a venison donation pathway.
- Identify any legal/public health compliance requirements that must be reflected in contracts, MOUs, or operating conditions.

### **Requested outputs from City Attorney's Office**

- A short memo identifying:
  - ODNR pathway and the legal prerequisites/conditions
  - ORC 2923.162 applicability and required conditions
  - controlling Columbus Code citations with brief applicability notes and recommended authorization mechanism
  - ORC 9.68 drafting guardrails
  - required contracting terms (insurance/indemnification/authority/stop-work)

- public records guidance for operational details
- legal requirements for processing/donation agreements