

PUBLIC SUBMISSION

Comment from San Diego Zoo Wildlife Alliance

Posted by the **Fish and Wildlife Service** on Nov 13, 2025

Docket Document ([FWS-HQ-LE-2025-0572-0001](#)) Comment

Comment

Attached are public comments made on behalf of the San Diego Zoo Wildlife Alliance related to Form 3-200-2 Designated Port Exception Permits

Attachments

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SDZWA Designated Port Permit Exception Public Comment FWS-HQ-LE-2025-0572 11-2025

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Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
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Re: Docket No. FWS-HQ-LE-2025-0572; Agency Information Collection Request; Federal Wildlife Applications and Reports – Law Enforcement

The Zoological Society of San Diego (d/b/a) San Diego Zoo Wildlife Alliance (SDZWA) appreciates the opportunity to submit the following public comments related to Form 3-200-2 “Designated Port Exception Permit” in response to the Notice of Agency Information Collection Activities posted by the US Fish and Wildlife Service Forest Service (USFWS), Docket No. FWS-2HQ-LE-2025-0572.

SDZWA is a nonprofit international conservation organization, committed to inspiring a passion for nature and working toward a world where all life thrives. SDZWA supports effective conservation action and brings the stories of their work back to the San Diego Zoo and San Diego Zoo Safari Park—giving millions of guests, in person and virtually, the opportunity to experience conservation in action. With a focus on healthy ecosystems and the interconnectedness of the health of people, wildlife, and the habitat they rely on, SDZWA aims to drive conservation outcomes benefiting people and the planet.

SDZWA submits a renewal Designated Port Exception Permit, Form 3-200-2, every three years to the USFWS Office of Law Enforcement based in Sacramento. Based on our experience during the renewal process we are submitting the following public comment to offer recommendations to resolve issues that would benefit both USFWS and those that submit these applications.

Recommendations:

SDZWA, as an accredited member of the Association of Zoos and Aquariums (AZA), participates in many critical wildlife conservation projects, including the Species Survival Programs (SSP) and recovery plans and programs for the species that we work with and that are in our care. These programs require frequent continental and international movement of wildlife amongst institutions to maximize genetic diversity and sustainability of these managed populations, many of which cannot be transported by air due to their size. For this reason, we need the ability to transport through non-designated ports and have a USFWS Designated Port Exception Permit.

Necessity and practical utility:

SDZWA believes that the information collected in the Designated Port Exception Permit, Form 3-200-2, is necessary and provides practical utility for the USFWS in managing wildlife permits and combatting illegal trade, and issuance of this permit minimizes deterioration or loss of wildlife species. Any proposed route through a non-designated port will contain the statement, "...as it is the most direct and shortest travel time for this transport, with the least amount of stops. This will reduce any increased stress to this highly sensitive species." Sometimes the animal is too large to get on a plane as well, ex: Giraffe.

Accuracy of burden estimate:

The accuracy of the 1.25-hour estimate for completing the form is only accurate if all the information in the permit application is the same. Now that the Designated Port Exemption Permit, Form 3-200-2, requires specific scenarios, the process can take longer and at times days to gather information from experts on our team.

Quality, utility, and clarity:

SDZWA recommends that the USFWS implement changes to the application to make sure that the information the agency is seeking matches what is being asked of the applicants. Whether this is a guided table or form, or a change in questions to more clearly ask for the information expressly needed by the agency, clarifying will allow applicants to better answer the questions and provide information required on the initial application.

Minimizing burden:

SDZWA recommends that a way to minimize the burden on respondents and USFWS for the Designated Port Exception Permit, Form 3-200-2, and all permits, would be to make it available through ePermits and to accept on-line payments, moving away from paper checks, which is currently the only option.

Conservation impact:

SDZWA believes that the information collection process can be strengthened to have a positive impact on wildlife conservation, if the purpose of the Designated Port Exception Permit, Form 3-200-2, was made clear about when it is needed, for example as it relates to CITES and/or ESA protections. For example, if the animal is not CITES or ESA listed and was born in the USA, it does not need this permit, such information would be helpful upfront.

As leaders in wildlife conservation, we appreciate this opportunity to comment and look forward to continuing our work on behalf of threatened and endangered species around the globe.

Sincerely,

San Diego Zoo Wildlife Alliance