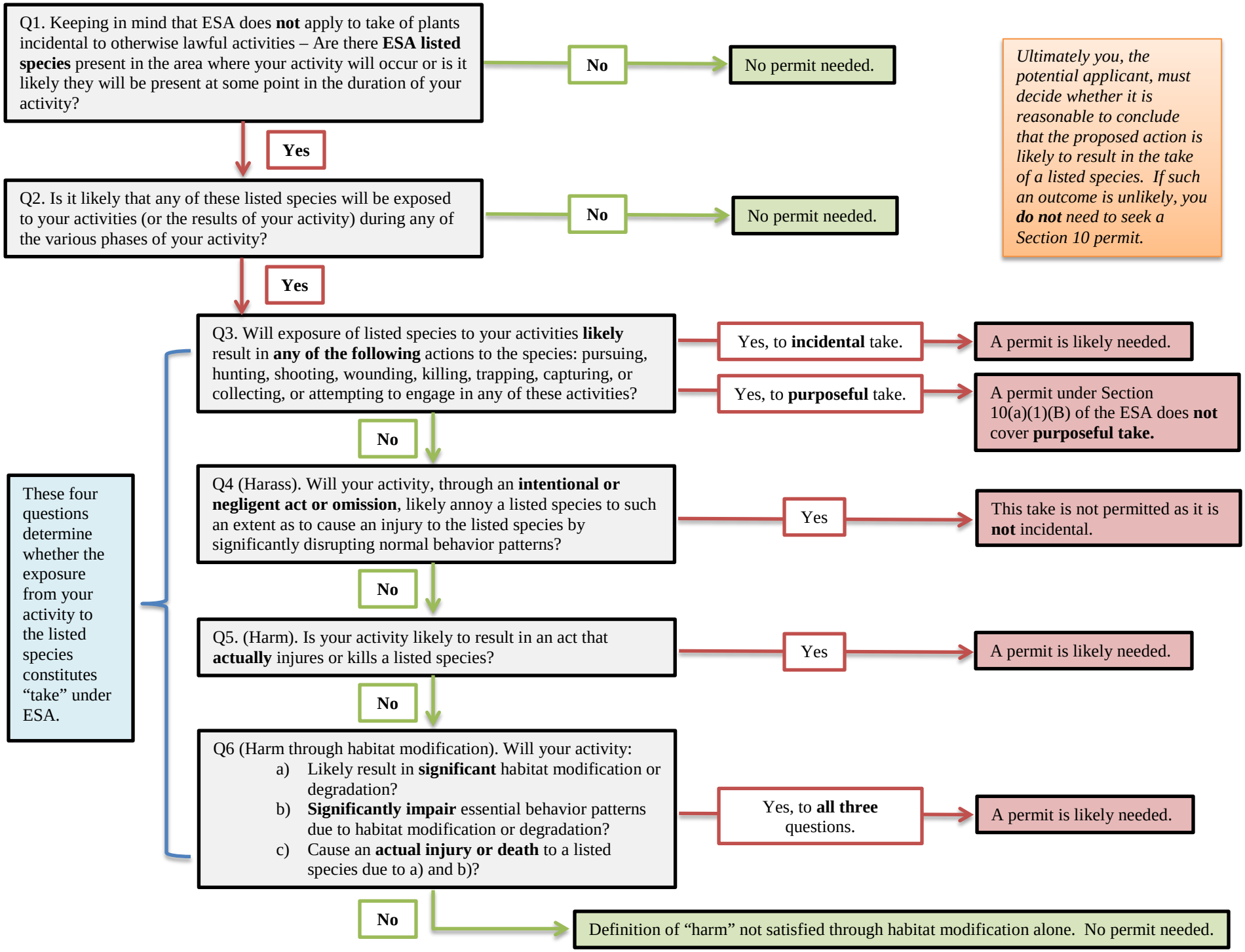Guidance on Determining Need for ITP under ESA Section 10(a)(1)(B)