**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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When installing insulation on exterior walls, there are many methods of attachment. For most rigid foam insulation, a plastic washer and nail or screw is sufficient. Sometimes for thin structural foam insulations, staples are used. This is acceptable because of the very low density or weight of the material. For example, a polyiso board may only be 2.3 PCF or about 0.24 pounds per square foot at R7.5, a common required R-value.

Other insulations are heavier. A stone wool product may be 11 PCF and at R8 (nearest value to R7.5), the weight is 1.83 pounds per square foot. This requires substantial hardware, often a continuous or intermittent metal z girt. Though substantial, this hardware is often listed in “fasteners.”

In 10.4 table, Eliminate the word fastener and use “Washers, screws, nails, and staples.” This will exclude minor components while ensuring the analysis includes the environmental impacts of substantial building components.

**Proposed Change to the Draft Standard\***  
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*

*Use a color other than red to indicate proposed changes to the draft.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Table 10.4.1 Excluded Building Components

|  |  |
| --- | --- |
| Exterior Walls | ~~Fasteners~~ Washers, screws, nails, and staples. |
| Insulation around units |
| Trim |
| Exterior shading |
| Insulation around glazing units |