614 Maple St.
Clay Center, Kansas 67432
785-632-5664

To whom it may concern
Re: Nebraska I.R.C. 2015 Code adoption.

We at Wardcraft would like you to consider omitting in their entirety the following sections of the 2015 I.R.C.

Section R302.13

This section requires the installation of an approved material on floor framing over a basement and/or a crawlspace (with fuel fired equipment) that consists of any framing other than 2x10 or greater dimensioned lumber or structural composite lumber. This means that the use of 2x8 dimension lumber, I-Joist and web trusses will require the builder to install an approved membrane on the bottom of the floor framing.

We feel that this presents a real hardship on our customers. Not only does it add a substantial increase in the price on the home, but also eliminates access to the area for future installation of electrical, plumbing and mechanical systems if the owner wants to finish the basement space at a later date.

Can you imagine installing ½" gypsum board to the bottom of the floor joist in a crawlspace with a furnace?

We at Wardcraft like to be environmentally responsible. Our standard floor framing uses I-joist made from small lumber flanges and an O.S.B. web or web trusses. If we are to meet the requirements of this section, with our system of building, we would need to use a more expensive framing system, or sheetrock the ceiling of the basement.

Section R303.4 and Section N1102.4.1.2 and Section N1103.6

Section R303.4 requires a blower door test on every home to determine if a home requires a whole house ventilation system. Section N1102.4.1.2 requires testing using a blower door & Section N1103.6 requires mechanical ventilation. Not only are these codes contradictory but we feel they place undo expense on the home owner. Wardcraft Homes builds a very tight structure. If Nebraska requires these tests and systems, the cost goes up.

Who will be responsible for verifying these requirements? How many companies that perform these tests are available in rural areas? Why strive to build a tight energy efficient structure and then install a continuously running fan to exhaust conditioned air to the outdoors?

Please consider the re-wording of Section P3103.2 concerning vent pipe frost closure, to read as in the previous code additions. Requiring an increase to 3" inside the "Thermal Envelope" as opposed to the "Building Envelope" will require any wall that contains DWV to be framed as a 2x6 wall.

In my conversations with The State of Colorado Division of Housing, they would more than likely amend this section as has the Colorado State Plumbing Board.

Thank you for considering my comments.

Chuck Krueger

Wardcraft Homes