*DRL Companion Document*

# The Configuration as a Structure of Authority

*Federal funding, certification networks, and the public-instruments effect in U.S. mass-timber policy*

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| **Document** | DRL Companion Report — Parallels & Tithe Loop |
| **Series** | DRL Thesis Codex v4.3.1 / Reagan Forestry Legacy v3.2 supplement |
| **Visual exhibits** | Vertical Timeline 1981–2030 (8 pp.); Landscape Price-Configuration Chart |
| **Posture** | Configuration described, intent not characterized. Public-record sources only. |
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## Abstract

This companion document examines the structural parallels between the federal mass-timber policy apparatus documented in the DRL Codex and the kind of authority structure that emerges in any mature regulatory community: a doctrine, an authorized clergy that interprets it, a network of certifying bodies that bind a downstream profession to it, and a flow of money that loops from public funding through advocacy programs back into the demand-creation that justifies the next round of funding. The point of drawing the parallel is not pejorative. It is structural. The structure is durable for the same reasons religious authority structures are durable: because each component reinforces the others, no single actor needs to coordinate, and the appearance of independent verification is itself produced by the apparatus.

A second observation, separable from the first, concerns antitrust framing. Conduct that would be per-se illegal under Section 1 of the Sherman Act if undertaken by private competitors — coordinated action that produces sustained price and market-share advantage for one product category — can be lawfully achieved when the same outcome is produced through public statutory instruments: tariffs, tax credits, building-code mandates, grant programs, and accounting conventions. The instruments are individually legal. Their cumulative effect is the structural advantage that antitrust law exists to prevent in private markets. This is the public-instruments effect, and it is harder to challenge than coordination because no antitrust violation has occurred.

Two visual exhibits accompany this report and are referenced throughout: the vertical timeline (1981–2030) shows the configuration's assembly chronologically; the landscape price-configuration chart shows the BLS Producer Price Index for softwood lumber (WPU0811) running across the same period with policy and tariff events marked beneath it. The two exhibits do different jobs. The vertical timeline shows that the apparatus thickens visibly from 2014 onward. The landscape chart shows what that thickening did to price.

# 1. Structure of authority: doctrine, clergy, denominations

Every regulatory community organises itself around a doctrine — a settled set of propositions about what is true, what is acceptable, and how disputes are resolved. In academic political science the apparatus is called an epistemic community or a private regulatory regime. In the mass-timber case the doctrine is biogenic carbon neutrality: the proposition that combustion or decomposition of wood-derived material does not contribute to atmospheric carbon load on a relevant timescale, because regrowth elsewhere offsets the release.

The doctrine has a sacred-text foundation: ISO 14040/14044 (life-cycle assessment principles), IPCC inventory guidelines, and — most prominently in U.S. domestic policy — the EPA's April 23, 2018 Statement of Policy declaring forest-biomass combustion at stationary sources carbon-neutral for regulatory purposes. The EPA Statement's own text says: "this statement of agency policy is not a scientific determination and does not revise or amend any scientific determinations that EPA has previously made." The doctrine, in other words, rests on a document that explicitly disclaims being a scientific finding. This disclaimer is in the foundational text. It does not stop the text from being treated as foundational.

## 1.1 The clergy that interprets the doctrine

Doctrines do not interpret themselves. In any mature authority structure there is a clergy: a set of bodies authorised by the doctrine itself to interpret its application to specific cases, draft guidance, and produce the technical literature that downstream users rely on. In the U.S. mass-timber apparatus the principal interpreters identified in this review include:

**American Wood Council (AWC).** Codes-and-standards drafting body. Self-described as "the wood products industry's signature program for the development of codes, standards and regulations" (awc.org). AWC technical staff drafted the Type IV-A/B/C provisions adopted into the 2021 IBC.

**Softwood Lumber Board (SLB).** Industry research-and-promotion order under USDA oversight (7 U.S.C. § 7411 et seq.). Funds and coordinates WoodWorks, Think Wood, and AWC programs. SLB describes WoodWorks' role as "converting projects to wood" and reports having "directly influenced 1,498 projects to choose wood" in 2024 alone.

**WoodWorks.** USDA-partnered specifier-conversion program funded by SLB. Distributes the WoodWorks Carbon Calculator free to architects. Provides continuing-education credits to design professionals. Performs project consultations described as "working directly with design and construction teams to support and influence projects, with the goal of facilitating a shift toward wood" (softwoodlumberboard.org/funded-programs).

**CORRIM (Consortium for Research on Renewable Industrial Materials).** Industry-funded research consortium that produces the LCA literature treating biogenic carbon as neutral by convention. CORRIM outputs are cited by WoodWorks materials, IBC code submissions, and federal grant proposals.

**USDA Forest Service.** Government partner. Administers the Wood Innovations Grant Program ($93M+ cumulative through January 2023, with up to $95M announced for FY2026). The Congressional Research Service (CRS Report R47752) noted in 2024: "It is not always clear what specific FS mission area or

authority has supported each of these activities." The line between the Forest Service's statutory mandate and the apparatus's market-conversion mission is, in the Congressional Research Service's published view, not always clear.

These bodies are not coordinating. None of them needs to. Each is performing its institutional function. The biogenic-neutrality doctrine, having been articulated in the foundational texts, is reproduced through their separate operations. The clergy interprets the doctrine because the doctrine is what their roles assume — and the roles exist because the doctrine produced the funding that made the roles possible. That circularity is the structure.

## 1.2 The denominations: certification networks

If the AWC and SLB are clergy, the certification networks are denominations: bodies that bind the working professionals to the doctrine through schemes that present themselves as independent verification. Each scheme has its own theology — its own balance of priorities, its own quirks — but on the carbon-accounting question that matters here, none departs from the biogenic-neutrality convention. The schemes look independent. On this question they are not.

| Scheme | Jurisdiction | How it treats biogenic carbon | Binding effect |
|---|---|---|---|
| **LEED (USGBC)** | Global / US-led | Awards Materials & Resources credits via EPDs that follow ISO 14040/14044 and adopt biogenic neutrality as default; recognises FSC certification. | Primary U.S. green-building certification. Required by federal procurement and many municipal codes for major projects. |
| **Green Star (GBCA)** | Australia | Materials credits use embodied-carbon LCA following ISO conventions; defaults align with biogenic neutrality. | Dominant Australian green-building certification; tied to public-procurement preferences and state-government building requirements. |
| **Homestar (NZGBC)** | New Zealand | Embodied-carbon assessment under the same LCA convention; $NECO_2$ database integration accepts biogenic-zero default. | Required or strongly preferred for Kāinga Ora and many local-government developments. |
| **BREEAM** | UK / Europe | Mat 01 credit awards via ISO 14040 / EN 15978 LCAs; biogenic neutrality is the operative default. | Major European green-building scheme; widely adopted in UK public procurement. |
| **BRANZ** | New Zealand | Building research authority producing the LCAQuick tool used in Homestar submissions; defaults | Tool provider whose outputs are accepted into Homestar and government procurement processes. |

| Scheme | Jurisdiction | How it treats biogenic carbon | Binding effect |
|---|---|---|---|
| | | follow ISO biogenic convention. | |
| **FSC** | Global | Forest-management certification, not carbon-accounting per se — but FSC-certified output is treated as proof of "sustainable" sourcing in downstream LCAs that apply biogenic neutrality. | De facto requirement for most green-building schemes' wood-sourcing credits. |
| **PEFC** | Global | Parallel forest-certification scheme; same downstream treatment in LCA. Mutual recognition with most national green-building schemes. | Together with FSC, forms the certifying floor for sourcing credits across nearly every green-building scheme worldwide. |
| **DGNB** | Germany / EU | Embodied-carbon and life-cycle assessment under EN 15978 / ISO 14040; biogenic neutrality is the default. | Leading German certification; influences EU Construction Products Regulation interpretation. |

Eight schemes, four continents, dozens of national variants of each, hundreds of thousands of certified projects worldwide. On any number of dimensions — water, energy, indoor air quality, biodiversity, social equity — they differ. On the carbon treatment of biogenic feedstock they do not. Each scheme reaches its conclusion through its own process. The conclusions arrive at the same place because the inputs to each process — the LCA standards, the calculator outputs, the literature, the certification of upstream forest management — are produced by the same clergy. A reader who only ever encounters timber's carbon claim through certification documents would never see the EPA Statement's own self-description as non-scientific, never see the Searchinger and Peng analysis published in Nature in July 2023, never see the Andersen et al. 2022 finding that the same CLT building yields 288.5 or 454.2 kg $CO_2$eq/m² depending on whether biogenic carbon is included in the boundary. The certification network is the lens. The lens is not neutral.

> *The certification schemes look independent. On the carbon question that matters most, they all defer to the same upstream sources. The appearance of independent verification is itself produced by the apparatus.*

## 2. The tithe loop: how the money returns to the apparatus

Authority structures that survive across decades do so because their funding regenerates through their own operations. In the religious-organisations literature this is described as the tithe loop — money flows from the laity to the institution through the institution's own teaching, and the teaching produces the next generation of lay contribution. The mass-timber apparatus exhibits the same circular structure. Every dollar the public spends through the apparatus produces conditions under which the next dollar gets justified.

Consider the documented flow:

**Stage 1: USDA grants fund WoodWorks.** USDA Forest Service Wood Innovations Grant Program awards (~$93M+ cumulative through January 2023, plus ~$74M in May 2024, plus up to $95M announced for FY2026) flow to recipients including WoodWorks, AWC, university CLT testing facilities, and mass-timber demonstration projects.

**Stage 2: WoodWorks trains specifiers.** WoodWorks distributes the WoodWorks Carbon Calculator free to architects, delivers continuing-education credits to design professionals, and provides project-consulting services that the SLB describes as designed to "support and influence projects, with the goal of facilitating a shift toward wood."

**Stage 3: Trained specifiers write wood into project specifications.** SLB reports its programs "directly influenced 1,498 projects to choose wood" in 2024 alone, generating 629 million board feet of incremental lumber demand. Cumulatively since 2015: 3,510 projects, 6 billion board feet of incremental demand, target of 2.9 billion board feet annual incremental demand by 2035.

**Stage 4: Project specifications create demand signal.** Demand creates the political case for the next funding round. Federal-grant announcements, congressional procurement legislation, and tax-credit proposals (LIMBER Timber Act, Fix Our Forests Act, mass-timber-specific provisions in the Inflation Reduction Act EPD program) reference the demand the apparatus produced as the justification for the next round of support.

**Stage 5: Demand signal justifies next round of grants.** USDA's February 2026 Wood Innovations announcement of up to $95 million cited Trump Executive Order 14225 as policy frame; the executive order, in turn, cites housing affordability and forest-management goals; the housing-affordability framing was first established in WoodWorks-funded materials. The grant program now justifies itself by reference to outcomes the program produced.

Each stage is documented. Each is individually defensible as policy. The loop's durability comes not from any single stage being objectionable but from the fact that the loop is closed — the apparatus generates the conditions under which it justifies its own continuation. The Congressional Research Service flagged this in CRS Report R47752 with admirable precision: "It is not always clear what specific FS mission area or authority has supported each of these activities." Congress's own research arm, reading the public record, cannot cleanly separate the agency's statutory function from the industry's market-development mission.

## 2.1 The asymmetry: no equivalent loop for competing materials

The defining feature of the loop is not its existence — analogous funding-and-advocacy structures exist for many policy domains — but its singularity within construction-materials federal funding. The DRL Reagan Forestry Legacy companion document examined this in detail and found, in the materials reviewed, no comparable specifier-facing market-development apparatus for steel, concrete, or aluminum in building construction:

| Apparatus component | Wood / mass timber | Steel | Concrete | Aluminum |
|---|---|---|---|---|
| Dedicated federal grant program for construction-market development | Wood Innovations: $93M+ cumulative + $95M FY2026 | Not identified | Not identified | Not identified |
| Industry co-investment with federal funds | SLB / USDA partnership ~$100M joint investment | Not identified | Not identified | Not identified |
| Free specifier-facing LCA calculator | WoodWorks Carbon Calculator, USDA-endorsed | Not identified | Not identified | Not identified |
| Federally-supported continuing education for architects/engineers | WoodWorks CE credits, USDA-funded | Not identified | Not identified | Not identified |
| Building-code amendment advocacy backed by federal research | USDA fire/seismic research → IBC Type IV-A/B/C | Not identified | Not identified | Not identified |
| Material-specific construction tax credit | LIMBER Act ($5/sq ft Mass Timber Construction Credit, expires Dec 31, 2030) | Not identified | Not identified | Not identified |
| Federal-policy carbon-neutrality declaration | EPA April 23, 2018 Statement of Policy | N/A | N/A | N/A |
| Estimated combined federal + industry co-investment 2015–2026 | $190–220M (plus LIMBER tax expenditure) | $28–83M (process R&D only) | Less than $50M (process R&D only) | Less than $20M (defense-focused) |

*Sources: USDA Forest Service grant announcements; Softwood Lumber Board program documentation; Department of Energy Industrial Demonstrations Program funding records; Congressional Research Service R47752; GSA IRA EPD program announcements. Public records reviewed; this table follows the Reagan companion document v3.2 §4.*

Every component the apparatus has built for mass timber, examined in this review, has no comparable counterpart in the federal innovation portfolio for any other structural material. The asymmetry is qualitative as well as quantitative. Steel, concrete, and aluminum receive process-decarbonization

research funding through DOE programs — funding to make the existing manufacturing process less carbon-intensive, not funding to convert specifiers from one material to another. The federal innovation portfolio for construction-market development, on the basis of this review, appears to function in practice as a single-material program.

## 3. The public-instruments effect: why this is not price-fixing — and why that matters

A natural reading of the configuration is to ask whether it constitutes price-fixing or some other form of antitrust violation. It does not, and the reason matters more than the question.

Per-se illegal price fixing under Section 1 of the Sherman Act requires horizontal agreement among competitors to set prices, allocate markets, or rig bids. Two lumber producers in a back room agreeing on a price floor — illegal. Three cement companies coordinating bids on a public works project — illegal. There is no industry-wide exemption that permits this conduct in any structural-materials sector, including oil. (The OPEC parallel sometimes raised in this context is misleading: OPEC is a sovereign-producer agreement among nation-states, not a U.S. private cartel, and U.S. domestic petroleum companies are not exempt from Section 1.)

What the mass-timber configuration produces is something different and harder to challenge. The same outcome — sustained price floor for a domestic product, sustained market-share advantage over substitutes, reduced competitive pressure from imports — is achieved through public statutory instruments rather than private coordination:

**Tariffs and antidumping duties.** Lumber V CVD/AD orders raised the cost of Canadian softwood imports by approximately 20% beginning November 2017, fell to 8.99% in December 2020, doubled to 17.91% in November 2021, rose to 14.54% in August 2024, and reached a combined preliminary 24.83% in 2025 with Section 232 tariffs of 10% on softwood and 25% on furniture and cabinetry stacked on top in October 2025. Each rate change is a Department of Commerce administrative determination — lawful by statute (19 U.S.C. § 1671 et seq.). The cumulative effect is a domestic price floor that demand fundamentals would not otherwise produce.

**Building-code mandates.** The 2021 IBC's Type IV-A/B/C provisions create a permitted construction pathway for mass timber up to 18 stories that has no equivalent for aluminum or steel modular framing. Adoption is voluntary at the state level but a substantial majority of U.S. states have adopted the 2021 IBC tall-mass-timber provisions either statewide or at the jurisdiction level (AWC Code Adoption Map). The code is the work of a private standards-development organisation; states adopt it by reference. The market effect is determined by code, not by competition.

**Material-specific tax credits.** The LIMBER Timber Act of 2026 (H.R. 7245) provides three new federal tax credits — Mass Timber Construction Credit ($5/sq ft), Mass Timber Plant Investment Credit, Mass Timber Workforce Development Credit — all tied to the statutory term "mass timber" and all expiring December 31, 2030. Tax credits are statutory; they are not horizontal coordination.

**Federal grant programs for market development.** Wood Innovations grants ($190–220M cumulative federal plus industry co-investment 2015–2026) fund specifier conversion, code advocacy, and market development for one material category. There is no comparable program for any other structural material. Federal grants are statutory expenditure; they are not coordination.

**Federal accounting conventions.** The EPA's April 23, 2018 biomass policy statement adopts biogenic carbon neutrality as regulatory accounting convention. The convention determines how the lumber

industry's products are characterised for purposes of LEED qualification, federal procurement preference, ESG classification, and tax-credit qualifying language. The accounting convention is policy; it is not coordination.

> *The public-instruments effect: conduct that would be per-se illegal if private competitors achieved it through coordination is fully lawful when the same outcome is produced through statutory instruments. The effect on competition is identical. The legal exposure is not.*

This is the critical observation, and it is what makes the configuration durable. There is no antitrust enforcement mechanism to dismantle it because no antitrust violation has occurred. There is no SEC disclosure requirement to surface it because the information is already public — it is in Federal Register notices, USDA grant announcements, IBC code language, and EPA policy statements. There is no private right of action by competitors because the harm is produced by lawful exercise of statutory authority. The state action doctrine (Parker v. Brown, 317 U.S. 341 (1943)) is adjacent but not directly on point — nobody has formally authorised lumber pricing — yet the operative logic is similar: when government instruments do the work that private coordination would be prosecuted for, the antitrust framework does not engage.

The remedy, if there is to be a remedy, is not litigation. It is auditing the configuration and naming what the public instruments are doing in aggregate. The DRL framework's contribution at this point is the audit. Not because audits dismantle apparatus — they do not — but because an audit is the precondition for whatever does.

## 4. The congregation: architects, specifiers, and the lens problem

An authority structure needs a congregation, and the mass-timber apparatus has one: working architects, specifiers, structural engineers, sustainability consultants, and project managers who do not author the doctrine but encounter it through the certification schemes, the calculators, the continuing-education credits, and the project-consulting services the apparatus provides at no cost to the recipient. The congregation is not zealous. Most of its members would not characterise themselves as advocates of any material category. They are professionals operating inside the lens the apparatus has built.

The lens has specific and consequential properties. The WoodWorks Carbon Calculator's default treatment of biogenic carbon produces lower embodied-carbon numbers for wood than non-default treatments would. A specifier using the calculator for a LEED Materials & Resources credit submission, or a federal procurement preference application, or an ESG-tagged project pitch, encounters the favorable result first. The unfavorable result — what the same building's emissions look like under consequential LCA, or under the Searchinger / Peng counterfactual published in Nature in July 2023, or under the Andersen et al. 2022 boundary that produced 454.2 vs. 288.5 kg $CO_2$eq/m² for the same CLT building — would require the specifier to step outside the calculator and seek out literature the apparatus does not distribute.

Specifiers who do this exist. Corgan, a major U.S. architecture firm, published its own analysis in 2024–2025 arguing that conventional mass-timber LCAs systematically omit biogenic-carbon emissions from forest slash, harvest residues, and end-of-life pathways, and the firm released a public-facing tool to help designers account for the omitted emissions. The Corgan analysis cites World Resources Institute research on the same omissions. This matters not because Corgan is correct on every detail (the science is contested in the peer-reviewed literature, with the Searchinger / Peng 2023 paper having drawn a Matters Arising critique by Sohngen, Baker, Favero and colleagues in Nature in October 2025 and a Reply from Searchinger, Berry, and Peng) but because Corgan represents specifier-side engagement with the underlying accounting question, funded by a specifying firm rather than by the apparatus. It is the WoodWorks model in reverse — privately funded specifier education that questions the convention rather than reinforcing it.

Whether such specifier-side engagement scales is the open question. The Reagan companion document treats it as evidence that the configuration is not unchallenged from inside the AEC profession. It is not yet evidence that the configuration is breaking down. What the architect on a Tuesday morning encounters when opening her LCA calculator is still the WoodWorks default. What the LEED submission template prompts her to enter is still the biogenic-zero number. What her continuing-education credits are still being earned through is still the apparatus's curriculum. The lens remains in place, and the cost of stepping outside it is high enough that most members of the congregation do not.

# 5. What the two visual exhibits show

Two visual artifacts accompany this report. They are referenced by name throughout and are designed to be readable as standalone exhibits.

## 5.1 The vertical timeline (DRL_Vertical_Timeline_v1.pdf, 8 pp.)

The vertical timeline arranges 51 events across five tracks (legislative/fiscal in blue, biological/financial in green, regulatory/policy in red, tariff/duty in orange, PPI price markers in yellow) with proportional time spacing. Each event card carries a date, a one-sentence description, and a primary-source citation. The eight pages cover seven eras: Legislative Foundation (1981–1997); REIT Consolidation and Dormant Policy (1998–2013); Apparatus Assembly (2014–2018); Code Adoption and Pandemic Onset (2019–2020); Pandemic Peak, Tariff Doubling, and IRA (2021–2022); Apparatus Deepens, Scientific Challenge (2023–2024); Federal-Land Activation and Section 232 (2025); and Forward Outlook (2026–2030).

The visual finding the timeline produces is density. Pages 1 and 2 (1981–2013) cover thirty-three years and contain twenty events — roughly one every twenty months, with multi-year gaps between policy actions. Pages 3 through 8 (2014–2030) cover sixteen years and contain thirty-one events, with the densest single year (2025) carrying five separate instruments in nine months. The thickening is the finding. The apparatus is not gradually assembled across the full forty-five years of the chart; it is assembled almost entirely in the back twelve years, in lockstep with the optimal harvest window for the 1988–1997 plantation establishment wave.

The keystone observation is on page 8. December 31, 2030 is the LIMBER Act tax-credit sunset date. Late 2030 is the closing edge of the optimal harvest window for the 1988–1997 plantation wave (loblolly pine economic-maturity rotation 25–33 years; trees planted in 1997 reach age 33 at end-2030). Two cards, side-by-side, on the same date. The statutory deadline and the biological deadline align. The Federation of American Scientists policy paper advocating for LIMBER cited the NLIHC 7.3-million-unit affordable-housing gap as central justification. The bill's expiration timing matches the harvest-window timing more closely than it matches any independently established housing-crisis timeline.

## 5.2 The landscape price-configuration chart (DRL_Landscape_PriceConfiguration_v1.pdf)

The landscape chart plots the BLS Producer Price Index for Softwood Lumber (series WPU0811, monthly observations January 1981 through March 2026) on a horizontal time axis, with policy and tariff event markers in the lower panel running across the same period. The PPI line carries six labeled peaks: 1993 (212), 2004 (232), 2018 (274), May 2021 all-time peak at 581.5, March 2022 second peak at 540.7, and March 2026 latest observation at 267.9. The 1982 baseline value of 100 is marked as a dashed reference line. Two shaded green bands indicate the plantation establishment wave (1988–1997) and the optimal harvest window (2013–2030).

What the chart makes visible at a glance:

**The 2021 peak occurs inside the harvest band.** The all-time PPI high of 581.5 (May 2021) sits squarely inside the 2013–2030 optimal-harvest window. The peak's proximate causes are documented: pandemic homebuilding demand, mill-capacity constraints during COVID, and supply-chain disruption. None of

these is policy-caused. But the peak's persistence — the price never returned to pre-pandemic baseline; March 2026 observation at 267.9 is still 2.7× the 1982 index value — is consistent with a domestic price floor sustained by the duty regime. The pandemic created the spike; the apparatus retained it.

**The configuration thickens from 2014 onward.** The lower panel of the chart shows event markers nearly absent across 1981–2013 (one legislative event, two tariff events, one regulatory event in 33 years), and visibly clustered across 2014–2026. Every track populates. The apparatus is built in the back quarter of the chart's time range.

**Tariff events synchronize with policy events more often than not.** The 2017 Lumber V CVD final determination (~20%) lands within an 18-month window of the EPA Pruitt biogenic memo and the IBC mass-timber-provisions adoption process. The November 2021 AR2 doubling of duties to 17.91% lands during the pandemic price spike, as state IBC adoption is rolling out and the harvest window economics are intensifying. The August 2025 AR6 increase to 24.83% combined and the October 2025 Section 232 stacking lands in the same six-month window as Trump EO 14225 (March 2025), the USDA Emergency Situation Determination on 113 million acres of federal land (May 2025), and the FY2026 Wood Innovations $95M announcement (February 2026). Each tariff action has its own administrative justification under 19 U.S.C. § 1671 et seq. — the AD/CVD process is technically independent of the broader policy. But the alignment is dense enough to be visible without commentary.

The framing discipline this report holds is that the chart shows what the chart shows. The reader can draw their own inference about whether the alignment is deliberate, coincidental, or the product of multiple actors responding to the same biological and demographic pressures at the same time. The DRL framework does not need the inference to be "deliberate" to make its central point: the configuration produces a structural advantage for one material category that the public instruments alone — without any private coordination — would be sufficient to explain.

## 6. What auditing the configuration would require

The DRL framework's contribution to this question is methodological. If the configuration is what this report describes, what would auditing it look like? Five components, each of which the DRL Codex develops in detail and each of which would survive review by a Federal Register-accustomed reader:

### *6.1 Disclosure parity across construction materials*

The simplest audit instrument is to require, for every federally-supported construction project above a threshold value, embodied-carbon disclosure under a single common-scale framework that does not adopt biogenic-neutrality conventions for one material that are not extended to functionally equivalent treatments for others. The FDA nutrition-label precedent is the architectural model: a regulator-authored common-scale disclosure that the producer cannot rewrite. The remedy is not banning timber; it is removing the asymmetric exemption.

### *6.2 Full-boundary accounting for biogenic carbon*

Where biogenic carbon is included in a life-cycle assessment for a federally-supported project, the assessment should be required to include all three of the boundary terms the DRL framework names: soil organic carbon efflux from harvest disturbance, end-of-life methane from anaerobic landfill decomposition (under EPA WARM v15 100-year decay framework, with sensitivity range disclosed), and foregone sequestration relative to a no-harvest counterfactual (per Searchinger / Peng 2023, with the methodology dispute disclosed). Sensitivity ranges should be disclosed alongside point estimates. M-grade scenario calculations should be labeled as such.

### *6.3 Sunset-clause disclosure of underlying biological economics*

Tax-credit and procurement-preference statutes whose sunset dates correspond to predictable biological windows should be required to disclose that correspondence in the legislative analysis. The LIMBER Act's December 31, 2030 sunset is, on its face, a reasonable five-year horizon; in context with the loblolly pine 25–33 year economic rotation and the documented 1988–1997 plantation establishment wave, the date does specific work that the legislative analysis does not currently surface.

### *6.4 Conflict-of-interest disclosure in agency-industry partnerships*

Where a USDA-partnered program performs the kind of specifier-conversion activity the SLB itself describes as "converting projects to wood" — and where the Congressional Research Service has noted that the partnership's authority basis is unclear — the activity should be subject to the same conflict-of-interest disclosure that applies to other agency-industry research collaborations. The CRS observation in R47752 is the audit hook. It exists in published Congressional record. It is a precondition the apparatus has not met.

### *6.5 Institutional separation between research and advocacy funding*

Federal grants whose statutory purpose is research should be administered through structures that institutionally separate research output from advocacy output — not because the WoodWorks-style specifier conversion is illegitimate, but because public funding of advocacy under research-program

authority is the precise structural condition that makes the apparatus durable and the precise structural condition that the CRS flagged as unclear. The remedy here is administrative, not legislative.

None of these audit components requires dismantling the apparatus, banning timber, or reversing biogenic-neutrality conventions in international LCA standards. They require disclosure, parity, and institutional separation. The framing the DRL Codex holds is exemption-removal, not new regulation. The mass-timber apparatus is asking for, and receiving, treatment its competitors do not receive. The audit asks only that the asymmetry be made visible and that decisions about whether to maintain it be made on the public record.

## Source register

Every claim in this report traces to a public document, public filing, or documented statutory instrument. The following register lists the principal sources, in the order they appear in the text:

EPA Statement of Policy on Forest Biomass, April 23, 2018 (Pruitt). EPA archived document; explicit text "this is not a scientific determination."

American Forest and Paper Association press release, April 23, 2018, characterizing EPA Statement as reflecting "long-standing scientific principles."

USDA Forest Service Wood Innovations Grant Program announcements, January 31, 2023 (cumulative $93M+ to 381 recipients); May 2024 ($74M, 171 projects); February 18, 2026 ($95M FY2026, citing EO 14225).

Softwood Lumber Board funded-programs documentation, softwoodlumberboard.org/funded-programs and /why-it-works.

Congressional Research Service Report R47752, "Mass Timber: Federal Programs and Policy Considerations," identifying the FS mission-area authority question.

International Code Council Final Action Hearings 2018–2019 establishing IBC Type IV-A/B/C; AWC Code Adoption Map at awc.org/priorities/codes-standards/adoption.

Bureau of Labor Statistics Producer Price Index by Commodity, Lumber and Wood Products: Softwood Lumber, series WPU0811, monthly observations January 1981 through March 2026, retrieved via FRED.

Federal Register Lumber V CVD/AD final determinations: 82 FR 51814 (November 8, 2017); 83 FR 347 (January 3, 2018); 85 FR 77163 (December 1, 2020) AR1; 86 FR 68467 (December 2, 2021) AR2; 89 FR 67062 (August 19, 2024) AR5; trade.gov AR6 announcement August 2025; Commerce preliminary AR7 April 9, 2026.

Trump Section 232 proclamation on softwood timber, lumber, upholstered furniture, and kitchen cabinetry, October 14, 2025; Congressional Research Service R48781.

H.R. 7245, "Limiting and Improving Manufacturing of Building products to Engineered Renewable wood Timber Act of 2026" (LIMBER Act), 119th Congress; expiration provisions in §3(d).

Executive Order 14225, "Immediate Expansion of American Timber Production," March 1, 2025; USDA Secretarial Memo (Rollins) establishing Emergency Situation Determination on approximately 113 million acres, May 2025.

Peng, Searchinger, Zionts, and Waite, "The Carbon Costs of Global Wood Harvests," Nature 620:110–115 (2023), DOI 10.1038/s41586-023-06187-1.

Sohngen, Baker, Favero et al., Matters Arising critique, Nature 646:E18–E19 (October 2025); Searchinger, Berry, Peng, Reply, Nature 646:E20–E23 (October 2025).

Andersen, Andersen, et al. (2022), CLT building LCA results 288.5 vs. 454.2 kg $CO_2$eq/m² depending on biogenic-carbon treatment.

Pomponi and Moncaster (2018) on embodied-carbon variation across structural materials.

NLIHC "Changing Priorities" (Dolbeare 2002); Cato Institute Policy Analysis No. 127 on Reagan-era HUD budget reductions.

Pub. L. 97-34 (Economic Recovery Tax Act of 1981); Pub. L. 99-514 (Tax Reform Act of 1986); Pub. L. 105-34 (REIT Modernization Act provisions, 1997); Pub. L. 117-169 (Inflation Reduction Act of 2022).

Sherman Antitrust Act, 15 U.S.C. §1; Tariff Act of 1930, 19 U.S.C. §1671 et seq.; Parker v. Brown, 317 U.S. 341 (1943).

USDA Forest Service Southern Research Station rotation-age guidelines for loblolly pine (Pinus taeda); Auburn and NCSU forestry literature on Southern U.S. plantation economics.

Corgan architecture firm public analysis and public-facing tool (2024–2025) on biogenic-carbon omissions in mass-timber LCAs; cites World Resources Institute research.

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