

COMMENTS ON THE 15-DAY NOTICE OF PROPOSED AMENDMENTS TO THE CALIFORNIA CAP-AND-TRADE REGULATION

To: Clerk of the Board, California Air Resources Board (CARB)

From: Sheng Su, CEO, Sustain You

Date: April 14, 2026

Dear Board Members,

Thank you for the opportunity to provide public comments on the 15-Day Notice of proposed amendments to the California Cap-and-Trade Regulation. Sustain You, as a company dedicated to organic waste valorization and distributed conversion systems in California, supports the extension of the program to 2045. This long-term framework provides essential institutional stability for clean technology investment and infrastructure innovation. Based on our field deployment and technical R&D experience, we submit the following recommendations:

I. Advancing Multi-Tiered Networked Systems to Strengthen Source Reduction

We recommend encouraging a synergistic organic waste management system that combines "small-scale distributed + large-scale centralized + subsurface enclosed" systems:

- **Support for Localized Distributed Deployment:** Enables on-site treatment of organic waste, significantly reducing carbon footprints and logistical costs associated with long-haul transportation.
- **Promotion of Subsurface Enclosed Infrastructure:**
 - **Near-Zero Biogenic Gas Leakage:** Utilizing subsurface negative-pressure environments allows for 100% capture of biogenic gases, particularly methane, eliminating uncontrolled emission risks at the source.
 - **Enhanced Operational Resilience:** Subsurface environments provide natural thermal stability, ensuring core biochemical reactions continue during extreme weather or grid fluctuations, providing passive safety and off-grid operational capability.

II. Aligning Emission Systems with Community Economy and Workforce Development

We suggest prioritizing projects that generate significant community co-benefits:

- **Green Job Transition:** Aligning facility operations with local workforce training (e.g., system maintenance and operation certifications) to support a "Just Transition" and build a technical workforce in regions like Solano County.
- **Energy-Food Circular Loops:** Encouraging the cascading use of thermal energy generated during conversion to support urban greenhouses. This "**waste-in, food-out**" model enhances community self-sufficiency and climate adaptation while lowering production costs.

III. Incentivizing Rapid Deployment and Low-Infrastructure Dependency

Prioritize support for technical pathways with the following characteristics to accelerate SB 1383 goals:

- **Modular & Rapid Deployment:** Short installation cycles that allow for immediate operational impact in response to municipal reduction pressures.
- **Low Infrastructure Dependency:** Reducing reliance on complex municipal grids or large-scale land use makes these systems suitable for high-density urban areas, industrial parks, and remote regions.

IV. Enhancing Recognition and Incentives for Distributed Source Reduction in the Carbon Market

To release broader grassroots emission reduction potential, we recommend that CARB:

- **Establish "Avoided Emissions" Assessment Frameworks:** Recognize the direct value of distributed systems in preventing methane generation at the source.
- **Study Aggregation Mechanisms:** Create simplified participation pathways for small-scale, high-frequency distributed projects to improve their visibility and economic viability within the overall carbon accounting system.

V. Summary of Policy Value

The "Source Reduction—Enclosed Process—System Synergy" pathway facilitates a deep integration of organic waste reduction and source-level emission control. This model enhances the stability of infrastructure systems and serves as a vital supplement to the current carbon market, providing a flexible and scalable realization path for California's 2045 carbon neutrality goals.

Sustain You appreciates CARB's continuous efforts in advancing California's climate policy. We look forward to exploring these innovative pathways further to help build a more efficient and forward-looking climate governance system.

Thank you for your review and consideration.

Sincerely,

Sheng Su

CEO, Sustain You

Benicia, California

Email: susheng2009@gmail.com

Phone: 510-925-6281