

DOCKETED

Docket Number:	23-ERDD-03
Project Title:	Carbon Removal Innovation Support Program (CRISP)
TN #:	249827
Document Title:	Martin Radosevich Comments - Heirloom Comment Letter on Carbon Removal Innovation Support Program
Description:	N/A
Filer:	System
Organization:	Martin Radosevich
Submitter Role:	Applicant Consultant
Submission Date:	4/20/2023 8:47:26 AM
Docketed Date:	4/20/2023

*Comment Received From: Martin Radosevich
Submitted On: 4/20/2023
Docket Number: 23-ERDD-03*

**Heirloom Comment Letter on 23-ERDD-03 Carbon Removal
Innovation Support Program**

Additional submitted attachment is included below.

April 20, 2023

California Energy Commission
Docket Unit, MS-4 Docket No. 23-ERDD-03
715 P Street
Sacramento, California 95814



Attn: Angela Gould, Deputy Director
Energy Research and Development Division

RE: Comment on 23-ERDD-03 “Carbon Removal Innovation Support Program”

Dear Deputy Director Gould:

On behalf of Heirloom Carbon Technologies (Heirloom) on the California Energy Commission’s implementation of its new Carbon Removal Innovation Support Program (CRISP), created under Assembly Bill 209 (The Energy and Climate Change budget bill, Chapter 251, Statutes of 2022). This new program will contribute to economy-wide decarbonization, accelerates direct air capture of CO₂, and ensures that California is at the forefront of this emerging technology. Programs like CRISP will promote direct air capture technology, which is necessary to meeting our net zero greenhouse gas (GHG) emissions reduction goals by 2045.

Heirloom is a California-based company, on a mission to remove 1 billion tons of CO₂ by 2035, which is ~10% of what the United Nations’ Intergovernmental Panel on Climate Change (IPCC) predicts we will need to remove by 2050 to stay on the 1.5°C warming pathway. Furthermore, large-scale deployment of carbon management technologies is crucial to meeting California’s goal of achieving statewide carbon neutrality no later than 2045.

Heirloom’s technology uses a natural direct air capture (DAC) technology pathway to remove carbon. The technology taps into one of the Earth’s most abundant resources, limestone, which makes up 4% of the Earth’s surface and costs as little as \$10 per ton, to remove CO₂ directly from the atmosphere. Just two months ago, Heirloom was proud to garner international acclaim for permanently storing CO₂ removed from the Bay Area by sequestering it in concrete, and having that concrete then poured into regional infrastructure projects in the region.¹

We welcome the opportunity to comment on the program and offer recommendations to improve eligibility for the program and greatly expand the opportunity to leverage more available federal and private funds. CRISP aims to complement various federal efforts focused on direct air capture. For instance, the federal Infrastructure Investment and Jobs Act (IIJA) includes \$3.5 billion for direct air capture hubs. Targeted state funding can leverage this very significant opportunity to support California innovators in successfully competing for these federal funds. As federal government funding generally requires match funding, the state can play a pivotal role

¹ Concrete traps CO₂ soaked from air in climate-friendly test REUTERS, <https://www.reuters.com/business/sustainable-business/concrete-traps-co2-soaked-air-climate-friendly-test-2023-02-03/> (last visited Feb 21, 2023)

by providing cost share to federal grant applicants. By leveraging multiple funding sources, California can accelerate the advancement of direct air capture projects.

Expand Funding Opportunities to Subcontractors

Currently, only lead applicants for these federal CDR funding opportunities are eligible applicants for the CRISP program Cost Share for Federal Clean Energy Funding Opportunities. It is crucial to note, the majority of the participants in these grants, especially the DAC Hubs are subcontractors and not lead applicants. The expectation for these projects is for these subcontractors to provide match funding as well; not only the responsibility of the lead applicant. Heirloom respectfully requests for the expansion of CRISP eligibility to subcontractors for relevant CDR-related funding opportunities, as long as they are California-based companies and the work is happening in California. This will further support the ecosystem of California CDR startups—potentially substantially more than the program as currently conceptualized. It would also allow for significantly more qualified applicants and the opportunity to mobilize more private and federal funding.

Thank you for your consideration.

If you have further questions, please contact Martin Radosevich at Martin@lh-pa.com or 916-905-1469.