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To: [Holbrook, Marcia](#)
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Subject: SUPPLEMENT to my Public comment (below) on item not on agenda: a fire protection development impact fee should be charged
Date: Saturday, August 16, 2025 10:06:45 AM
Attachments: [MEMORANDUM re fire protection impact fees v3.pdf](#)
[Fire Protection setting Plan Orinda Draft Environmental Impact Report.pdf](#)
[Fire Protection Impact discussion in Plan Orinda Draft Environmental Impact Report.pdf](#)
[Figure 4.10-1 Police and Fire Services Locations from Plan Orinda Draft Environmental Impact Report.pdf](#)

To the Board of MOFD: As a supplement to my Memorandum (re-attached for your convenience) recommending a procedure to impose a development impact fee for fire protection, please be advised of the discussion in the Draft Environmental Impact Report for Plan Orinda; the relevant pages are attached. Based on my discussions with the Orinda City Manager regarding the analogous issue of an impact fee for police (which Moraga but not Orinda has adopted), in which she stated her reliance on the DEIR, I anticipate a similar response and resistance to a fire protection impact fee. I find her response and resistance, and the analysis in the DEIR, flawed for the following reasons.

First, the DEIR addressed a different issue: whether there would be a physical impact of development on fire protection that would be significant (a term of art under CEQA).

Second, and more fundamentally, the DEIR analysis is simply wrong, because of its sole focus on response time based on distance from existing fire stations. Using that “logic” a population increase no matter how large would not have any impact. An obvious flaw is that, as population increases, so does the likelihood of existing firefighters and ambulances being out on a service call when a second or third service call arrives. Also, it isn’t the role of a DEIR to determine that a decrease in service due to development needs to be accepted by a community.

I reiterate my request that you urge Orinda and Moraga, in the strongest terms, to enact a fire protection development impact fee for the reasons explained in my Memorandum.

Respectfully,

Nick Waranoff

From: Nick Waranoff <waranoff@comcast.net>

Sent: Thursday, August 14, 2025 4:13 PM

To: 'Holbrook, Marcia' <mholbrook@mofd.org>

Cc: 'Isaacs, Jeff' <jisaacs@mofd.org>; 'Irving, Casey' <cirving@mofd.org>; 'councilmembers@cityoforinda.org' <councilmembers@cityoforinda.org>; Linda Smith <lsmith@cityoforinda.org>; Lashun Cross <lcross@cityoforinda.org>; 'Douglas Alessio' <dalessio@cityoforinda.org>; 'swoehleke@moraga.ca.us' <swoehleke@moraga.ca.us>; 'khillis@moraga.ca.us' <khillis@moraga.ca.us>; 'bdolan@moraga.ca.us' <bdolan@moraga.ca.us>; 'Imaglio@moraga.ca.us' <Imaglio@moraga.ca.us>; 'gthiel@moraga.ca.us' <gthiel@moraga.ca.us>; 'townclerk@moraga.ca.us' <townclerk@moraga.ca.us>; 'Scott Mitnick' <smitnick@moraga.ca.us>; 'surzua@moraga.ca.us' <surzua@moraga.ca.us>

Subject: Public comment on item not on agenda: a fire protection development impact fee should be charged

Please place on agenda and distribute to board of MOFD

Nick Waranoff

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MEMORANDUM

To: Board, Moraga-Orinda Fire District
From: Nick Waranoff
Subject: How Can MOFD, Orinda and/or Moraga Charge a Development
Impact Fee for Fire Protection
CC: Jeff Isaacs, Fire Chief
Orinda
City Council
City Manager
Planning Director
Finance Director
Moraga Town Council
Town Manager
Planning Director

Date: August 14, 2025

Introduction and Executive Summary: The state housing mandate, and recently enacted and pending state laws, require Moraga and Orinda to up-zone (increase allowable density) to accommodate, or ministerially approve, new housing projects with a potential to increase the District’s population by 30% or more. How will the additional cost of serving these additional people be funded?

Based on my research, as I explain below, the District should adopt a resolution that formally asks Orinda and Moraga to impose on the District’s behalf, collect, and transfer to the District a Fire Protection Impact Fee, to recover the cost of “public facilities” (as defined) that will be needed to serve the many thousands of additional residents. This fee would be imposed on developers in connection with their building permits. The fee cannot be implied retroactively. Moraga and Orinda are currently engaged in upzoning to comply with the state housing mandate, and it can reasonably be anticipated that applications for development will follow such upzoning. Therefore, the time to act is now, lest money otherwise be left on the table.

I conclude at the end of this Memo that this seemingly unusual process is legally required, and has been done in other cities with fire districts that are not under the jurisdiction of a single city. I have included links that address all of the issues, and that can be used as templates. The Town and City will of course, need to conduct their own nexus study, which likely can be done jointly.

Impact of State Housing Laws on District Population

State Housing Mandate: The state housing mandate, and other laws, require cities to approve ministerially new housing developments that meet certain criteria.

SB 828 (Wiener 2018)

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB828 was described as a bill that “strengthens the Regional Housing Needs Assessment (RHNA) by increasing state oversight over local and regional housing obligations....”

<https://cappa.memberclicks.net/assets/StateLegislation/2018/SB%20828%20fact%20sheet.pdf>

In April 2023, a housing analyst wrote, “Since 2017, the State of California has adopted over 100 new laws designed to increase housing production. Most of these laws have been focused on incentivizing local governments to approve more housing and expedite housing approval processes.”

<https://ternercenter.berkeley.edu/wp-content/uploads/2023/04/New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf>

Under the state housing mandate, each city was required to prepare a Housing Element (part of General Plan) to show how the city’s Regional Housing Needs Allocation (“RHNA”) can be accommodated. This is generally done by upzoning (increasing density). Orinda was assigned a RHNA of 1,359 units for 2023-2031.

Link to Orinda Housing Element

<https://cityoforinda.app.box.com/v/6thCycleHEAdoptedCertified>

Moraga was assigned 1,118. Link to Moraga Housing Element:

<https://www.moraga.ca.us/DocumentCenter/View/8125/2023-2031-Moraga-Housing-Element-Clean-version-PDF>

Orinda prepared an Environmental Impact Report (“EIR”) that concluded that over 6,600 residents could be added to Orinda based on the state mandate, plus the Downtown Precise Plan (“DPP”). (See DEIR, p. 2-17, Section 2.4.3 Population Projections (<https://cityoforinda.app.box.com/v/PlanOrindaDraftEIR>). Although Orinda has rescinded the DPP, the Council directed staff to continue to work on it.

Other voluntary local governmental actions may substantially increase

population in MOFD: Orinda staff, at the direction of the City council, is also working on other option plans, including the MTC’s Transit Oriented Communities (“TOC”) that would authorize even more new residents than the DPP. See Jan. 21, 2025 Orinda City Council staff report for Item H2 beginning at Packet Pg. 101 here

<https://orindaca.igam2.com/Citizens/FileOpen.aspx?Type=1&ID=2459&Inline=True>
e As stated in the staff report, compliance with TOC guidelines would increase density beyond the “pending” DPP. (See p. 104.)

I am not as familiar with the details concerning Moraga, but the exact numbers do not matter.

Other Laws

Other state laws that increase housing include AB-2011 Affordable Housing and High Road Jobs Act of 2022, as amended by AB 2243.

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240AB2243 A presentation by Orinda’s Planning Director on October 9, 2024, explained that this bill would authorize as many as 1939 units in downtown Orinda within one-half mile of BART. See p. 13 here

<https://cityoforinda.app.box.com/v/6thCycleHEImplementationSlides/file/1947575536358>

Using the standard of 2.8 residents per unit (DEIR, p. 2-17, footnote 2 <https://cityoforinda.app.box.com/v/PlanOrindaDraftEIR>), this would add over 5,400 residents downtown alone.

In addition, SB 79 has passed the State Senate and is pending in the Assembly. It would increase by-right development, subject only to ministerial approval, in much higher densities in Orinda than the DPP or TOC programs would authorize; six to

ten story buildings would be authorized anywhere and everywhere in downtown Orinda.

Note: neither the upzoning pursuant to the state housing mandate, nor under recent and pending laws, takes into account the 50% to 100% additional units that a developer can claim under the state Density Bonus Law.

Second note: although I have referred to density and population figures, the state law requires the use of square footage not dwelling units for the calculation starting July 1, 2022. AB 602 (2021 Grayson).

Development Impact Fees

The California Constitution requires that the state pay for the cost of a state-mandated program. “(a) Whenever the Legislature or any state agency mandates a new program or higher level of service on any local government, the State shall provide a subvention of funds to reimburse that local government for the costs of the program or increased level of service....” (Cal. Const., Art. XIII B, Sec. 6. <https://law.justia.com/constitution/california/article-xiii-b/section-6/> .) The term “local government” includes special districts. (Cal. Const., Art. XIII B, Sec. 8(d). <https://law.justia.com/constitution/california/article-xiii-b/section-8/>)

“In 1979, California's voters adopted article XIII B, section 6 of the state Constitution, which specifies that if the state imposes any “new program or higher level of service” on any local government (including a school district), the state must reimburse the locality for the costs of the program or increased level of service.

“In 1984, the Legislature enacted statutes to govern the state mandate process. (§ 17500 et seq.) Under these statutes, the Commission on State Mandates (the Commission) determines, pursuant to a “test claim” process, whether a state program constitutes a reimbursable state mandate. (§§ 17551, subd. (c), 17553.)” (*Clovis Unified School Dist. v. Chiang* (2010) 188 Cal. App. 4th 794, 798-799.)

Many of the other state housing laws specifically address this issue by providing that impact fees can be imposed.

SB 828, mentioned above, provides in Section 5: “No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution because a local agency or school district has the authority to levy service charges, fees, or assessments sufficient to pay for the program or level of service mandated by this act, within the meaning of Section 17556 of the Government Code.”

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB828

Likewise AB 2243 provides: “SEC. 14. No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution because a local agency or school district has the authority to levy service charges, fees, or assessments sufficient to pay for the program or level of service mandated by this act, within the meaning of Section 17556 of the Government Code.”

““Local agency” means any city, county, special district, authority, or other political subdivision of the state.” Govt Code section 17518.

Thus, the Legislature contemplates that local agencies will levy fees (rather than taxes).

In general, impact fees are authorized under the Mitigation Fee Act (Government Code Sections 66000-66025). They must be supported by a nexus study demonstrating the connection between the development, the need for public facilities, and the amount of the fee. The fee must be reasonably related to the cost.

Important note: the Mitigation Fee Act, Govt Code section 66000(d), defines “public facilities” to be “public improvements, **public services**, and community amenities” (Emphasis added.) See footnote 1 at this link:

<https://www.hcd.ca.gov/sites/default/files/docs/policy-and-research/plan-report/nexus-study-template.pdf>

Government Code section 65913.8 provides “A fee, charge, or other form of payment imposed by a governing body of a local agency for a public capital facility improvement related to a development project may not include an amount for the maintenance or operation of an improvement when the fee, charge, or other form of payment is required as a condition of the approval of a development project, or required to fulfill a condition of the approval.”

<https://law.justia.com/codes/california/code-gov/title-7/division-1/chapter-4-2/section-65913-8/>

No one would question that capital expenditure for new trucks and related equipment, and new or additions to fire stations to house the equipment, are proper subjects.

The District and the residents have a right to maintain the current level of service.

Examples of local development fees

Many local jurisdictions charge development impact fees. Orinda and Moraga charge some fees.

Some other examples of fees:

- a. Moraga public safety (police only) impact fee
<https://www.moraga.ca.us/ArchiveCenter/ViewFile/Item/177> (.)
- b. City of Covina police and fire impact fees <https://covina.ca.gov/wp-content/uploads/2024/06/Exhibit-B-Draft-Updated-Development-Impact-Fee-Schedule.pdf>

HCD template <https://www.hcd.ca.gov/sites/default/files/docs/policy-and-research/plan-report/nexus-study-template.pdf>

Additional examples of fees charged are discussed below.

The Apparent Gap in the Law for Fire Protection Districts

There seems to be a gap in the law because cities can only charge fees for costs they will incur. Cities may, of course, charge development impact fees, but must jump through certain hoops under the Mitigation Fee Act. There are many discussions about such fees. See, e.g., <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/fees-and-exactions>

Nexus studies are required. Also, “Any fee assessed pursuant to this subdivision shall not exceed the costs reasonably borne by the local agency.” Govt Code 17581(c).

But fire districts cannot impose such fees. Health & Safety Code 13916(a) states that “A [fire] district board shall not charge a fee on new construction or

development for the construction of public improvements or facilities or the acquisition of equipment.”

Thus, at first glance, a problem seems to exist that there appears to be no “local agency” that can charge a development impact fee for fire protection.

Nevertheless, for example, the Contra Costa County Fire Protection District charges development impact fees. https://www.cccfpd.org/wp-content/uploads/2025/01/CCCFPD_Annual-5-Year-DIF-Report-FY-2024_Final.pdf

It did a nexus study in 2019 and proposed a fee hike.

<https://www.biabayarea.org/confire-proposes-impact-fee-hike#:~:text=MORE%20INFORMATION:%20Under%20the%20nexus,in%20May%20or%20June%202018.>

The Rodeo-Hercules Fire District also charges development impact fees. See page 51 of 98 in the agenda packet here.

<https://www.rhfd.org/files/d3149e39a/MAY+2024+PACKET.pdf>

I cannot explain why some fire districts charge fees notwithstanding H&S Code section 13916(a).

But recent action in Cotati, described below, appears to offer the best solution.

Possible Solutions and Actions

1. Given that Orinda and Moraga have a fire district that is independent of the cities, and the cities themselves do not provide fire protection, build fire stations etc., can those cities impose a fire protection development impact fee? I don't think so.
2. Can the District impose such a fee? Apparently not. Health & Safety Code 13916(a).
3. Remaining possible solutions:
 - a. File a lawsuit challenging section 13916(a) on equal protection grounds?
 - b. File a claim with the state Commission on State Mandates <https://csm.ca.gov/> ? This probably cannot be done because a fee can be imposed, as explained below. See Govt Code 17556(d).

<https://codes.findlaw.com/ca/government-code/gov-sect-17556/> But if fee does not cover full impact, e.g., firefighter salaries, see below.

- c. Enter into a Joint Exercise of Powers Agreement. In 2015, a Joint Exercise of Powers Agreement was entered into among Lafayette, Moraga and Orinda to set a Development Impact Fee for transportation; that body continues to exist.

<https://contracostalafco.org/documents/jpa/Lamorinda%20Fee%20and%20Financing%20Authority%20JPA.pdf>https://lafayette.granicus.com/Viewer.php?view_id=&clip_id=7715&meta_id=196807; and its 2015 nexus study is being updated.

[https://www.lovelafayette.org/city-hall/city-](https://www.lovelafayette.org/city-hall/city-departments/engineering/transportation/request-for-proposals)

[departments/engineering/transportation/request-for-proposals](https://www.lovelafayette.org/city-hall/city-departments/engineering/transportation/request-for-proposals)

This JEPA could not be used, because Lafayette is not part of MOFD, and creating a new JEPA for a fire protection fee seems more cumbersome than what, in my opinion, is the Best Solution, described below.

- d. **BEST SOLUTION- how to impose fee:** MOFD should do what was done earlier this year for the Rancho Adobe Fire Protection District. MOFD should initiate a formal request to Orinda and Moraga to establish development impact fees for fire protection, on behalf of MOFD. The cities of Moraga and Orinda would then adopt parallel resolutions, after a joint nexus study, imposing fire protection development impact fees on behalf of MOFD. The actions by the Cotati City Council and the Sonoma County Board of Supervisors show how to do so, with all of the details.

- i. Cotati City Council. See archived meeting packets for Dec. 10, 2024 and Jan. 14, 2025 city council meeting, and click on the agenda packet, then scroll to pages 83-141.

<https://www.codepublishing.com/CA/Cotati/html/Cotati04/Cotati0415.html>

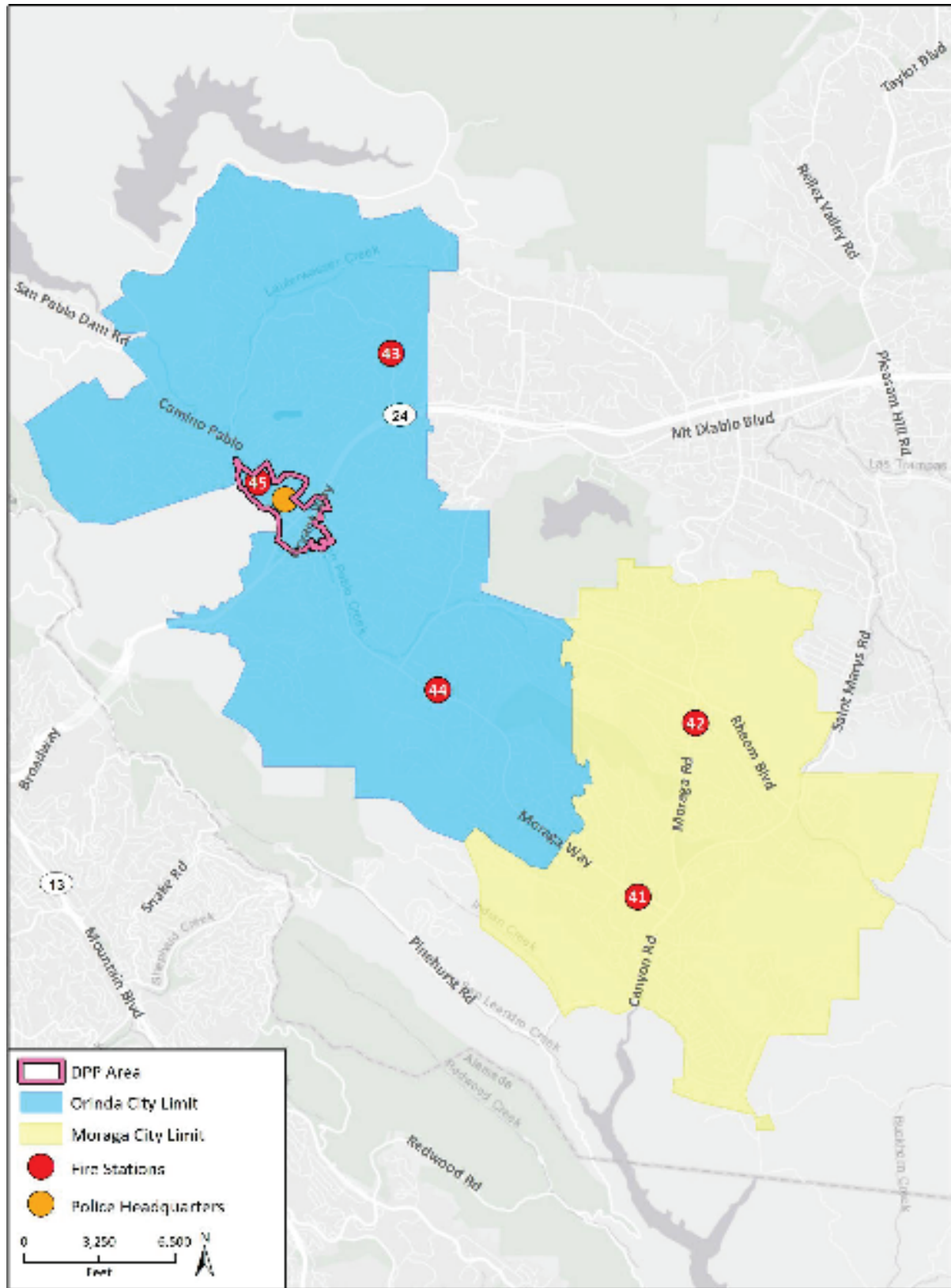
The Cotati Agenda Packet contains all of the information you need, including their nexus study, and can be found here

<https://cotaticity.primegov.com/public/portal>

ii. Sonoma County Board of Supervisors <https://sonoma-county.legistar.com/LegislationDetail.aspx?ID=7101802&GUID=DC4AAA30-FBD3-4546-8DF2-4DD4141A58BF>

4. What about firefighters' salaries and benefits? There is widespread belief that salaries cannot be charged as a development impact fee, although I have not found any case or statute addressing that question or defining "public services." But assuming that is the case, a test claim could be filed with the Commission on State Mandates. <https://csm.ca.gov/> Lack of authority to impose a fee justifies such a claim. (*Department of Finance v. Commission on State Mandates* (2022) 85 Cal. App. 5th 535.)

Figure 4.10-1 Police and Fire Services Locations



Images provided by Microsoft Bing and its licensors © 2021.
Additional data provided by City of Orinda, 2020.

Fig. 4.10-1 Police and Fire Services

b. Project Impacts and Mitigation Measures

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR FIRE PROTECTION SERVICES. HOWEVER, THIS INCREASE WOULD NOT REQUIRE ADDITIONAL AND/OR EXPANDED FIRE PROTECTION FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Housing Element Update

As discussed in Section 4.9, *Population and Housing*, development facilitated by the Housing Element Update outside of the DPP area would add an estimated 2,142 residents to the City, increasing Orinda's population from 19,078 to 21,220 persons. This population increase would incrementally increase demand for fire protection services.

Development facilitated by the Housing Element Update outside of the DPP area would increase calls for service throughout the City for issues including, but not limited to, emergency medical service, structure or vegetation fires, and traffic collisions. The direct effect on the MOFD would include evaluation of staffing and resource deployment to accommodate the increase in call volume throughout the community including Fire Stations 43, 44, and 45. MOFD currently responds to 3,000 incidents annually for approximately 38,500 residents (including population of the Town of Moraga), which is about 0.08 incidents per resident. Therefore, development facilitated by the Housing Element Update would induce about 171 annual incidents. Since all the Housing Opportunity Sites are within MOFD's existing service area and 2 miles of the nearest fire stations, emergencies on these sites would generally be responded to within current response times and would not require additional fire stations to be built.

Development facilitated by the Housing Element Update outside of the DPP area would be required to comply with applicable fire code and ordinances for construction, emergency/fire access, water mains, fire flows, and hydrants, and would be subject to review and approval by the MOFD prior to building permit and certificate of occupancy issuance. Prior to issuance of occupancy permits, project applicants would be required to pay City fees for Fire Code plan review and inspections.

General Plan Policies 4.2.1.A, 4.2.2.F, 4.2.2.G, and 5.4.2.B are intended to reduce fire risk in the City by encouraging fire protection and prevention education, development of an ordinance that requires fire protection features, and response to all structural fires with three engine companies. The MOFD receives its funding through property taxes and fees for service and can fund expanded services as new development occurs. Development facilitated by the Housing Element Update outside of the DPP area would be required to pay fire protection development impact fees to fund additional facilities, staff resources, and equipment. These funds, in addition to MOFD's share of property tax revenue within its service area would help pay for costs associated with the development of new fire stations, if needed, including any required environmental analysis. Furthermore, construction of a new fire station or expansion of an existing station would be subject to CEQA review at the time a site is identified and a specific design proposed. Therefore, impacts

related to new or physically altered fire protection facilities from Housing Element implementation outside of the DPP area would be less than significant.

Downtown Precise Plan

As discussed in Section 4.9, *Population and Housing*, development facilitated by the DPP would add an estimated 4,503 residents to the City, increasing Orinda's population from 19,078 to 23,608 persons. This population increase would incrementally increase demand for fire protection services.

Development facilitated by the DPP would increase calls for service in Orinda's downtown area near the BART station for issues including, but not limited to, emergency medical service, structure fires, and traffic collisions. The direct effect on the MOFD would include evaluation of staffing and resource deployment to accommodate the increase in call volume throughout the community, primarily from Fire Station 45. Development facilitated by the DPP would induce about 324 annual incidents. Since the DPP area is within MOFD's existing service area and 0.5 mile of the nearest fire station, emergencies on these sites would generally be responded to within current response times and would not require construction of a new fire station.

The discussion above under *Housing Element Update* also applies to the DPP since OMC, Orinda's General Plan, impact fees, and property tax revenue apply to development facilitated by the DPP. Therefore, impacts related to the provision of fire services from development within the DPP area would be less than significant. Taken together, the Housing Element Update and DPP would facilitate development that would accommodate 6,672 new residents, increasing Orinda's population to 25,750 residents. Expanded fire protection facilities would not be necessary to serve development facilitated by the project due to the location of existing facilities and current service ratios and response times. Still, the DPP and Housing Element Update would have a less than significant impact on the provision of fire services.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR POLICE PROTECTION SERVICES. HOWEVER, THIS INCREASE WOULD NOT REQUIRE ADDITIONAL AND/OR EXPANDED POLICE PROTECTION FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Housing Element Update

As discussed in Section 4.9, *Population and Housing*, development facilitated by the Housing Element Update outside of the DPP area would add an estimated 2,142 residents to the City,

4.10 Public Services and Recreation

This section analyzes impacts related to the provision of facilities for public services, including fire protection services, police protection services, schools, parks, recreational facilities, and library facilities, associated with project implementation.

4.10.1 Setting

a. Fire Protection

The Moraga-Orinda Fire District (MOFD) provides fire protection and emergency medical services to Orinda. This service area represents 42 square miles and approximately 38,500 residents (MOFD 2021a). The MOFD operates five fire stations including five paramedic engine companies, one (cross-staffed) paramedic truck company, four paramedic ambulances (three cross-staffed), and one Battalion Chief. MOFD is an “all-risk” fire service agency with 64 regular employees, six temporary employees, 30 volunteers, and 5 Board of Directors members.

MOFD’s goal for staffing is reviewed each budget cycle and considers historical and current year information related to fire and emergency services. MOFD responds to over 3,000 incidents annually. MOFD provides Advanced Life Support care within 6 minutes of notification, approximately 90 percent of the time (MOFD 2021b). MOFD’s annual budget is 27.9 million dollars, funded through property taxes. The Fire Marshall currently deems crews and equipment adequate, although response times in certain areas of the city have response times greater than six to eight minutes and fires may commit all firefighters on duty.

Primary service to most of the Housing Element Sites outside the DPP would be provided by Fire Stations 43 and 44, which are located at 20 Via Las Cruces and 295 Orchard Road, respectively. Primary service to Housing Element Site HE-5 and the DPP Sites would be provided by Fire Station 45, which is located at 33 Orinda Way (MOFD 2021c). Figure 4.10-1 shows the locations of fire stations in Orinda. Table 4.10-1 shows staffing and equipment held by each station.

Table 4.10-1 Orinda Fire Protection District Staffing by Divisions

Station	Address	Staffing	Fire Engines	Other Key Equipment
41	1284 Moraga Way	5 firefighters	Fire engine, Type III wildland fire engine	1 ambulance
42	555 Moraga Way	3 firefighters	Fire engine, Type III wildland fire engine	N/A
43	20 Via Las Cruces	3 firefighters	Pumper, Type III wildland fire engine	N/A
44	295 Orchard Road	3 firefighters	Ladder truck, Type VI wildland fire engine, Water tender	N/A
45	33 Orinda Way	4 firefighters, 1 Chief Officer	Fire engine, Four-wheel drive wildland fire engine	1 ALS ambulance

Source: MOFD 2021c