Kaufman and Broad-South Bay, Inc. v. Morgan Hill Unified School District (1992) 9 Cal.App. 4th 464

Formation of a Mello-Roos District was not a project for purposes of CEQA. The court held that "the causal link between the action (formation of CFD 1) and the alleged environmental impact (construction of new schools) is missing." The school district was not proposing any specific construction, nor was the CFD the sole possible means of funding future schools. In this case, there was insufficient project description for a meaningful environmental review.