

CALIFORNIA COURT OF APPEAL, THIRD APPELLATE DISTRICT

Napa Valley Unified School District v. State Board of Education

C099068, C099069 (Cal. Ct. App. Apr. 10, 2025) · No. C099068; C099069 · Decided April 10, 2025

SUMMARY

The California Court of Appeal reviewed consolidated challenges to the State Board of Education’s reversal of decisions denying a petition to establish the Mayacamas Charter Middle School. The court concluded that the State Board incorrectly determined that the local school district and county board had abused their discretion, and affirmed the trial court’s judgments granting writ relief. The opinion addresses the applicable mandate-review standards and the interpretation of Education Code section 47605 concerning charter-school appeals.

CASE DETAILS

COURT	California Court of Appeal, Third Appellate District
WRITING FOR THE COURT	Hull, Acting P. J.; Krause, J.; Mesiwala, J.
JURISDICTION	California Court of Appeal, Third Appellate District
DECIDED	April 10, 2025
DOCKET	C099068; C099069
DISPOSITION	affirmed
PROCEDURAL POSTURE	The Napa Foundation appealed from consolidated superior court judgments granting petitions for writs of mandate filed by the Napa Valley Unified School District and the California School Boards Associations Educational Legal Alliance. The superior court ordered the State Board of Education to set aside its decision reversing the local boards' denials of a charter-school petition.
STANDARD OF REVIEW	The court reviews agency action rather than the trial court's decision. Depending on whether ordinary or administrative mandate applies, the inquiry is whether the agency action was arbitrary, capricious, or entirely lacking in evidentiary support, or whether substantial evidence supports the agency's findings. The court reviews statutory interpretation and other questions of law de novo. The court held that the outcome was the same under either potentially applicable mandate standard.

PRECEDENTIAL VALUE	Published and certified for publication; precedential California Court of Appeal opinion.
PARTIES	Napa Foundation for Options in Education v. Napa Valley Unified School District, California School Boards Associations Educational Legal Alliance, State Board of Education

TOPICS

judicial review of agency action

administrative law

statutory interpretation

standard of review

appellate procedure

PRACTICE AREAS

administrative law

education law

charter schools

civil procedure

appellate procedure

QUESTIONS PRESENTED

1. Whether the State Board had substantial or other sufficient evidentiary support for finding that the District Board failed to provide a fair and impartial charter-petition process.
2. Whether the County Board's denial was ineffective because written factual findings were not adopted simultaneously with the vote to deny the charter petition.
3. Whether the County Board timely adopted its written findings within the statutory 90-day period.
4. Whether the State Board had substantial evidence or other sufficient support for concluding that the County Board failed to establish that the proposed charter school would substantially undermine existing services, academic offerings, or programmatic offerings.
5. Whether the former version of Education Code section 47605, subdivision (k)(2)(E), required the State Board to find an abuse of discretion by both the District Board and the County Board, or by either one, before reversing.

HOLDINGS

1. The State Board's determination that the District Board abused its discretion by failing to provide a fair and impartial hearing process was unsupported by substantial evidence and, alternatively, entirely lacking in evidentiary support. Because the District Board acted in a quasi-legislative capacity, the Napa Foundation's procedural-due-process bias standard did not apply to the District Board's decision.
2. Education Code section 47605 did not require the County Board to adopt written factual findings at the same moment it voted to deny the petition. The denial became effective when the County Board adopted the required written factual findings on April 5, 2022.
3. The County Board's April 5, 2022, denial, including its adoption of written factual findings, was timely because the statutory period did not begin before the Napa Foundation perfected its submission with the required materials and certification, which occurred no earlier than January 5, 2022 on this record.

4. The State Board's conclusion that the County Board did not provide evidence that the proposed charter school would substantially undermine existing services, academic offerings, or programmatic offerings was unsupported by substantial evidence and was alternatively arbitrary, capricious, and entirely lacking in evidentiary support.
5. The court did not decide whether former Education Code section 47605, subdivision (k)(2)(E), required an abuse-of-discretion finding as to both the District Board and County Board or only one of them because the State Board had not properly reversed either local board.

KEY QUOTATIONS

“Under the arbitrary and capricious standard, the question is whether the agency’s action has a reasonable basis in law and a substantial basis in fact.” (at 14-15)

“We review the agency’s action, not the trial court’s decision.” (at 30)

“The factual findings demonstrate that the Mayacamas Charter School was demonstrably unlikely to serve the interests of the entire community based on its fiscal impact because it “would substantially undermine existing services, academic offerings, or programmatic offerings.”” (at 29)

FACTUAL BACKGROUND

In 2021, Napa Foundation for Options in Education petitioned the Napa Valley Unified School District to establish Mayacamas Charter Middle School. The District Board denied the petition based on findings concerning the proposed school's financial and operational viability, educational program, petitioners' qualifications, statutory compliance, and likely effects on the community. The County Board likewise denied the petition, finding that the proposed school would substantially undermine existing services and programs through its fiscal impact. The State Board reversed both denials, but the superior court and Court of Appeal concluded that the State Board's reversal lacked adequate evidentiary support.

PROCEDURAL HISTORY

The District Board denied Napa Foundation's petition to establish Mayacamas Charter Middle School. The County Board also denied the petition, after which the Napa Foundation appealed to the State Board. The State Board reversed both local determinations, finding that the District Board had failed to provide a fair and impartial process and that the County Board had not satisfied the statutory requirements concerning fiscal impact and substantial undermining of existing services. The superior court granted writ relief and ordered the State Board to set aside its decision; the Court of Appeal affirmed.

DISPOSITION

affirmed

CASES CITED

- Anderson Union High School Dist. v. Shasta Secondary Home School, 4 Cal.App.5th 262, 267-268 (2016)
- Today’s Fresh Start, Inc. v. Los Angeles County Office of Education, 57 Cal.4th 197, 205-206, 219 (2013)

- California School Boards Assn. v. State Bd. of Education, 240 Cal.App.4th 838, 846 (2015)
- Martis Camp Community Assn. v. County of Placer, 53 Cal.App.5th 569, 593-596 (2020)
- Bunnett v. Regents of University of California, 35 Cal.App.4th 843, 849 (1995)
- Sacramentans for Fair Planning v. City of Sacramento, 37 Cal.App.5th 698, 707 (2019)
- Save Civita Because Sudberry Won't v. City of San Diego, 72 Cal.App.5th 957, 983 (2021)
- Wilson v. Hidden Valley Municipal Water Dist., 256 Cal.App.2d 271, 286-287 (1967)
- San Francisco Unified School Dist. v. San Francisco Classroom Teachers Assn., 222 Cal.App.3d 146, 149 (1990)
- Security Pacific National Bank v. Wozab, 51 Cal.3d 991, 998 (1990)
- Abdelqader v. Abraham, 76 Cal.App.5th 186, 198 (2022)
- Harris v. University Village Thousand Oaks CCRC LLC, 49 Cal.App.5th 847, 853 (2020)

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