



Informal Interpretation Report Number 9494



Date February 17, 2026

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Section 208.2

Question:

On a given site (auto dealership), if a portion of an on-grade parking lot is replaced in part by a building addition with roof-top parking, does the new parking structure qualify as a separate parking facility for the purposes of interpreting the number of accessible parking spaces needed by this Code section for each parking facility?

Answer

Yes, please see the attached code section and commentary

Commentary:

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

Furthermore, there is Advisory 208.2 Minimum Number. The term “parking facility” is used in Section 208.2 instead of the term “parking lot” so that it is clear that both parking lots and parking structures are required to comply with this section. The number of parking spaces required to be accessible is to be calculated separately for each parking facility; the required number is not to be based on the total number of parking spaces provided in all of the parking facilities provided on the site.

Notice:

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Business & Professional Regulation, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.