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Counsel for Petitioner, QTS Salem, LLC

IN RE: PETITION TO VACATE PUBLIC
STREETS

BOARD OF SUPERVISORS OF SALEM
TOWNSHIP

PETITION TO VACATE PUBLIC STREETS

Petitioner, QTS Salem, LLC, a Delaware limited liability company, by its attorneys, Troutman Pepper Locke LLP, petition the Board of Supervisors of Salem Township, Luzerne County, Pennsylvania (the “Board”), to vacate portions of Market Street, Kiliti Road, and Moskaluk Road (the “Streets”), pursuant to 36 P.S. §2011 and 53 P.S. §67304. In support thereof, Petitioner states the following:

1. The Streets are public streets which are opened and located within Salem Township (the “Township”). The Petitioner requests the vacation of the portions of the Streets (the “Vacation Area”) depicted on Exhibit A.

2. The Vacation Area are entirely fronted by properties owned by Petitioner (the “Properties”).

3. Vacating the road will not adversely affect the public because the Vacation Area benefits only the Properties and is unnecessary for the public convenience.


4. Vacating the Vacation Area would promote the public welfare in that the Township would not be charged with financial and other responsibilities for any future upkeep or maintenance of the Vacation Area.

5. Petitioner signs this petition to release the Township from all damages sustained as a result of the proposed vacation.

6. Petitioner agrees that any ordinance adopted by the Board vacating the Vacation Area shall include within it a reservation of the easement rights of any municipal or public utilities within the Vacation Area. Petitioner's proposed ordinance is attached hereto as Exhibit B.

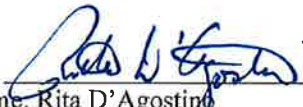
WHEREFORE, Petitioner requests the Board of Supervisors of the Township to (1) hold a hearing on this Petition and (2) vacate the Vacation Area by ordinance pursuant to 53 P.S. §67304(a) in the form attached hereto as Exhibit B.

TROUTMAN PEPPER LOCKE LLP

By: 
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Attorney for Petitioner

Date: 3/17/2026

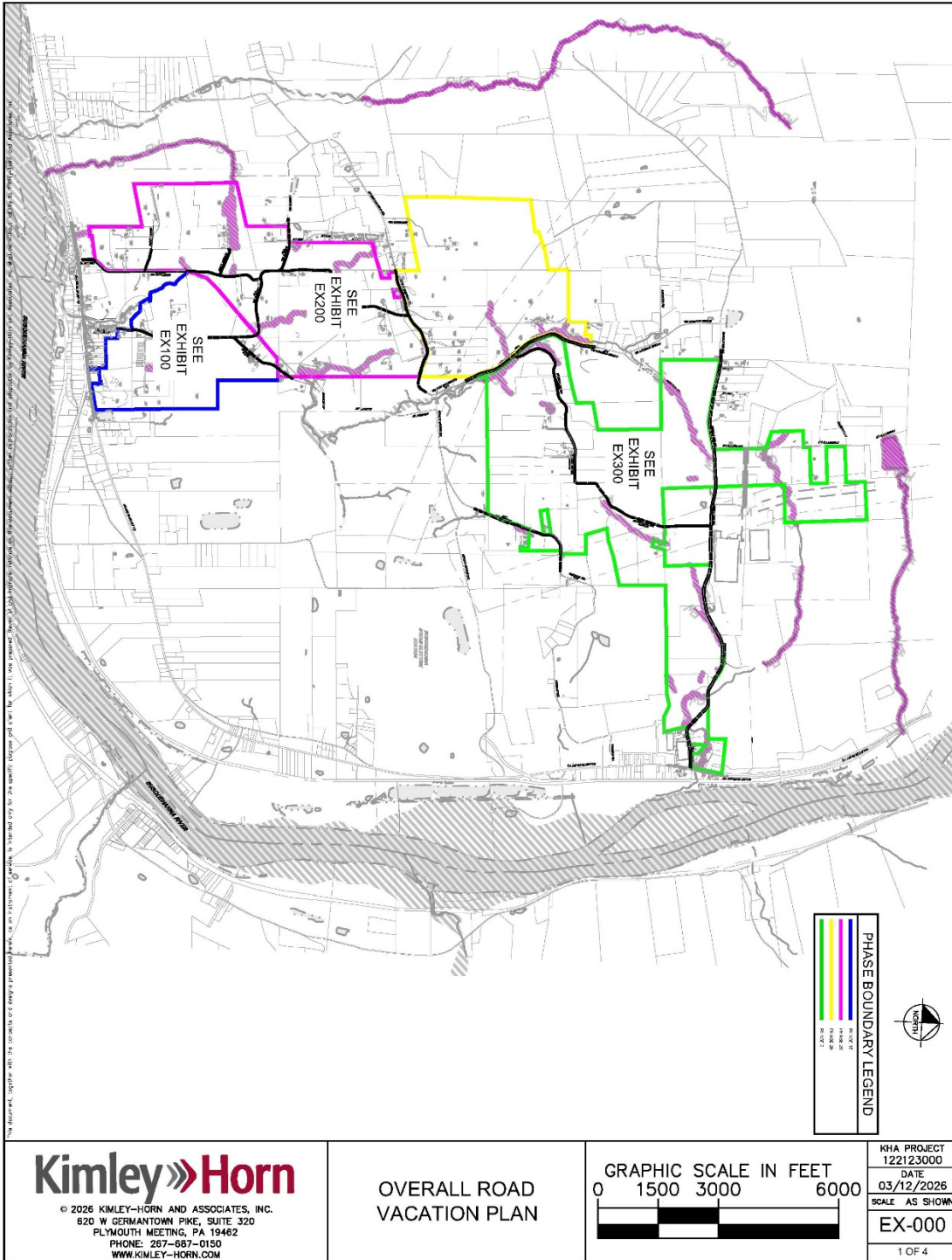
QTS Salem, LLC, a Delaware limited liability company

By: 
Name: Rita D'Agostino
Title: Authorized Signatory

Date: 3/17/2026

EXHIBIT A

Vacation Area



Kimley»Horn

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OVERALL ROAD
VACATION PLAN

GRAPHIC SCALE IN FEET
0 1500 3000 6000

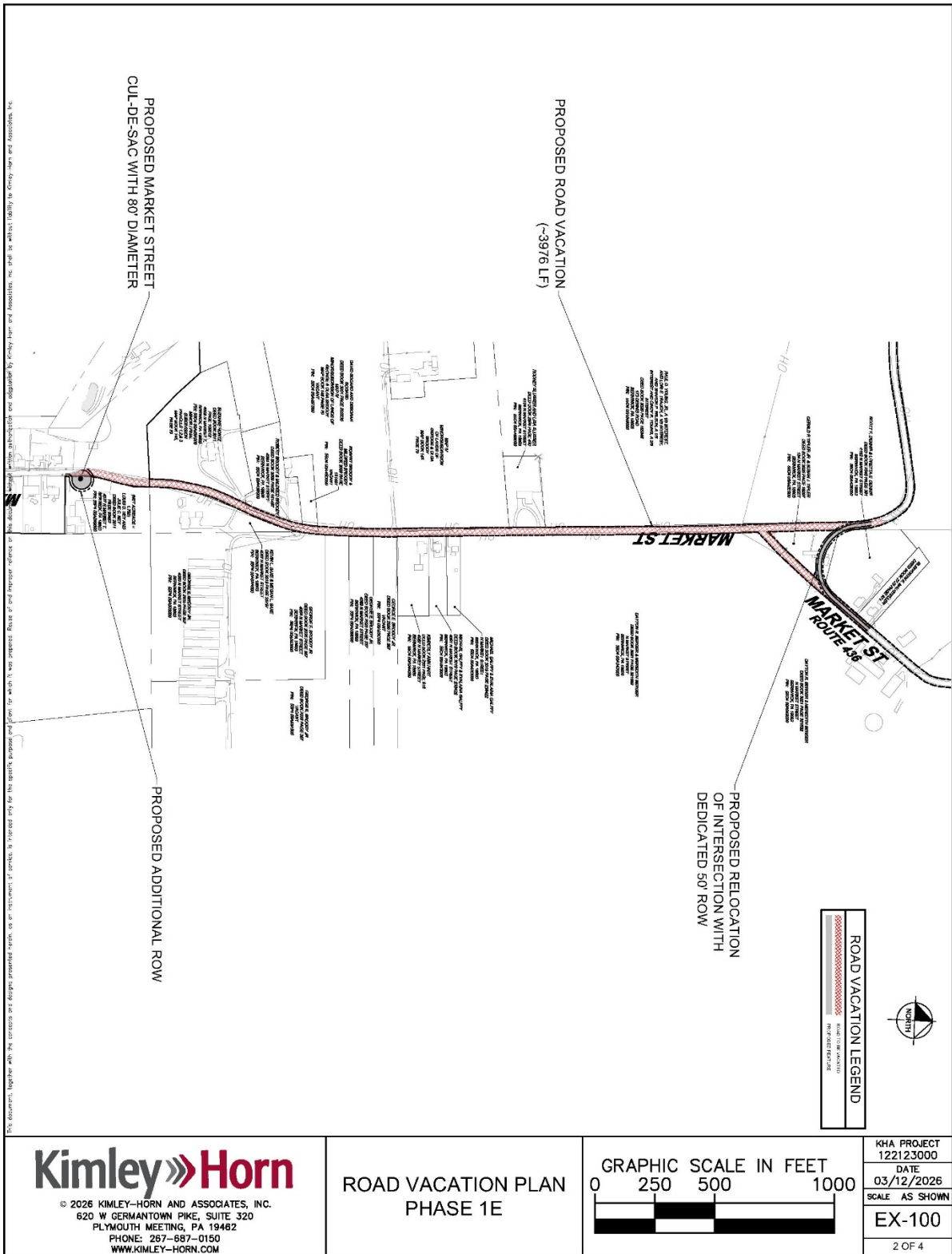


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DATE
03/12/2026
SCALE AS SHOWN

EX-000

1 OF 4

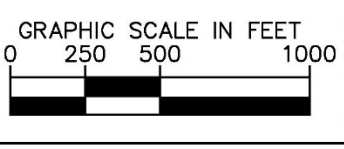
Exhibit A - 1



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ROAD VACATION PLAN
 PHASE 1E



KHA PROJECT
 122123000
 DATE
 03/12/2026
 SCALE AS SHOWN
EX-100
 2 OF 4

Exhibit A - 2

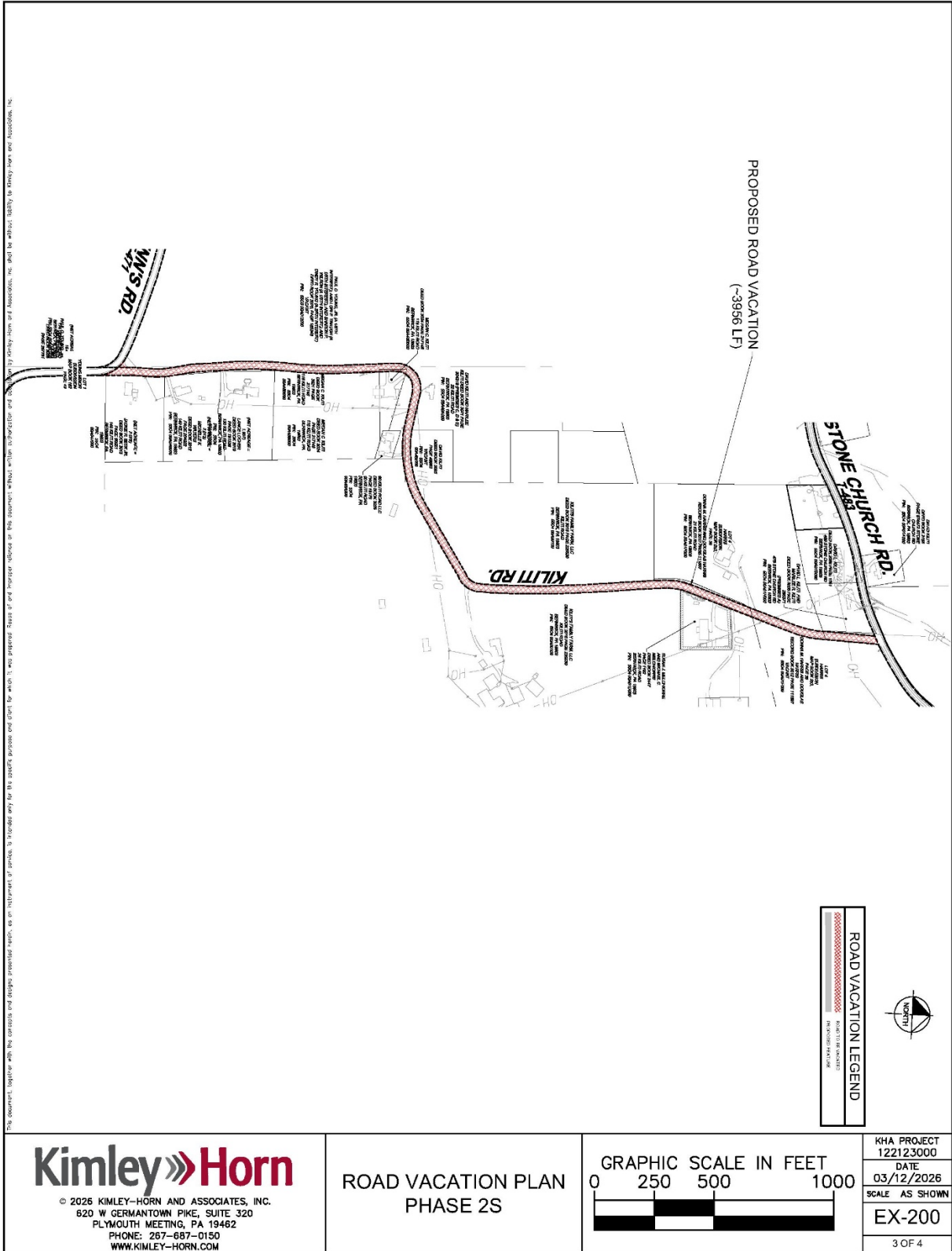
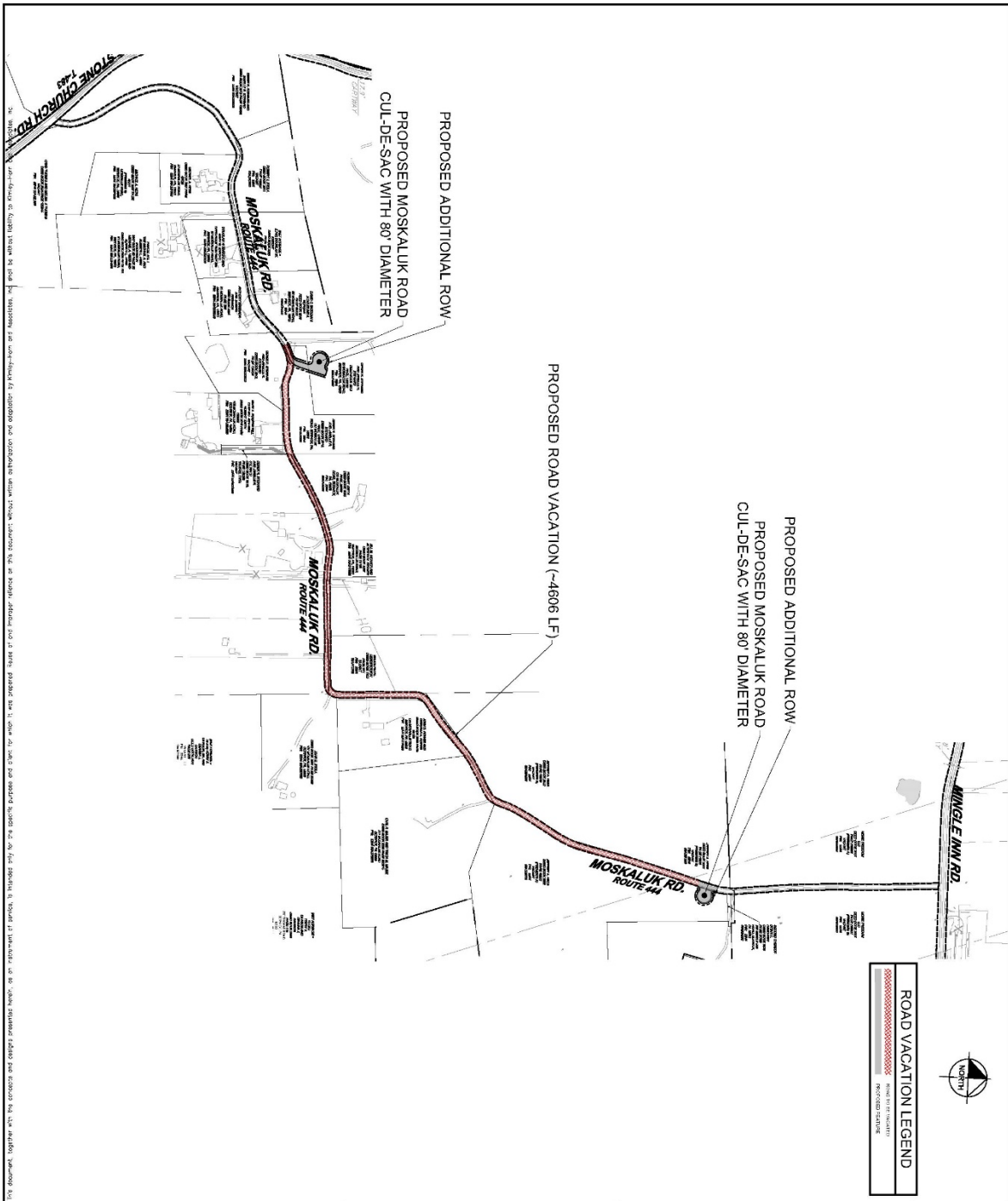


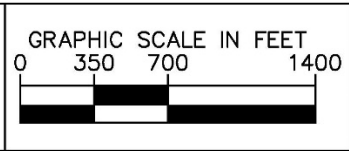
Exhibit A - 3



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ROAD VACATION PLAN
 PHASE 3



KHA PROJECT	122123000
DATE	03/12/2026
SCALE	AS SHOWN
EX-300	
4 OF 4	

Exhibit A - 4

EXHIBIT B

Proposed Ordinance

ORDINANCE NO. _____

**AN ORDINANCE OF SALEM TOWNSHIP, LUZERNE COUNTY, PENNSYLVANIA,
VACATING PORTIONS OF MARKET STREET, KILITI, AND MOSKALUK ROAD**

WHEREAS, the Pennsylvania Second Class Township Code, 53 P.S. Section 67304 authorizes the Board of Supervisors to vacate roads within the Salem Township by ordinance; and

WHEREAS, QTS Salem, LLC, a Delaware limited liability company, as equitable owner of properties (the “Properties”) abutting Market Street, Kiliti Road, and Moskaluk Road (the “Streets”), has submitted a Petition to Vacate portions of the Streets; and

WHEREAS, following a duly advertised and noticed public hearing held on April ____, 2026, the Salem Township Board of Supervisors determined it is in the best interest of Salem Township to vacate the portions of the Streets that were the subject of the petition submitted by QTS Salem, LLC; and

WHEREAS, this Ordinance has been duly advertised as required by the Pennsylvania Second Class Township Code.

NOW THEREFORE, IT IS HEREBY ENACTED AND ORDAINED by the Board of Supervisors of Salem Township, as follows:

SECTION 1: The portions of the Streets as identified on Exhibit A (the “Streets”), which is attached to this Ordinance and made a part hereof, are vacated as and for public streets of Salem Township, subject to the reservations and requirements noted in Section 2, below, of this Ordinance.

SECTION 2: The vacated portions of the Streets are subject to the following reservations and conditions:

a. The portions of the Streets vacated remain subject to the rights of any existing public or municipal utilities located within the vacated area of the Streets, if any; and

b. That QTS Salem, LLC, its successors and assigns, releases Salem Township from all damages Salem Township may sustain as a result of the vacation.

SECTION 3: This Ordinance upon enactment shall further constitute an agreement addressing the damages and benefits agreed to that are associated with the vacation undertaken hereby.

ENACTED AND ORDAINED this ____ day of _____, 2026.

ATTEST:

TOWNSHIP OF SALEM

Township Secretary

Chairman, Board of Township

(SEAL)

EXHIBIT A

The Streets

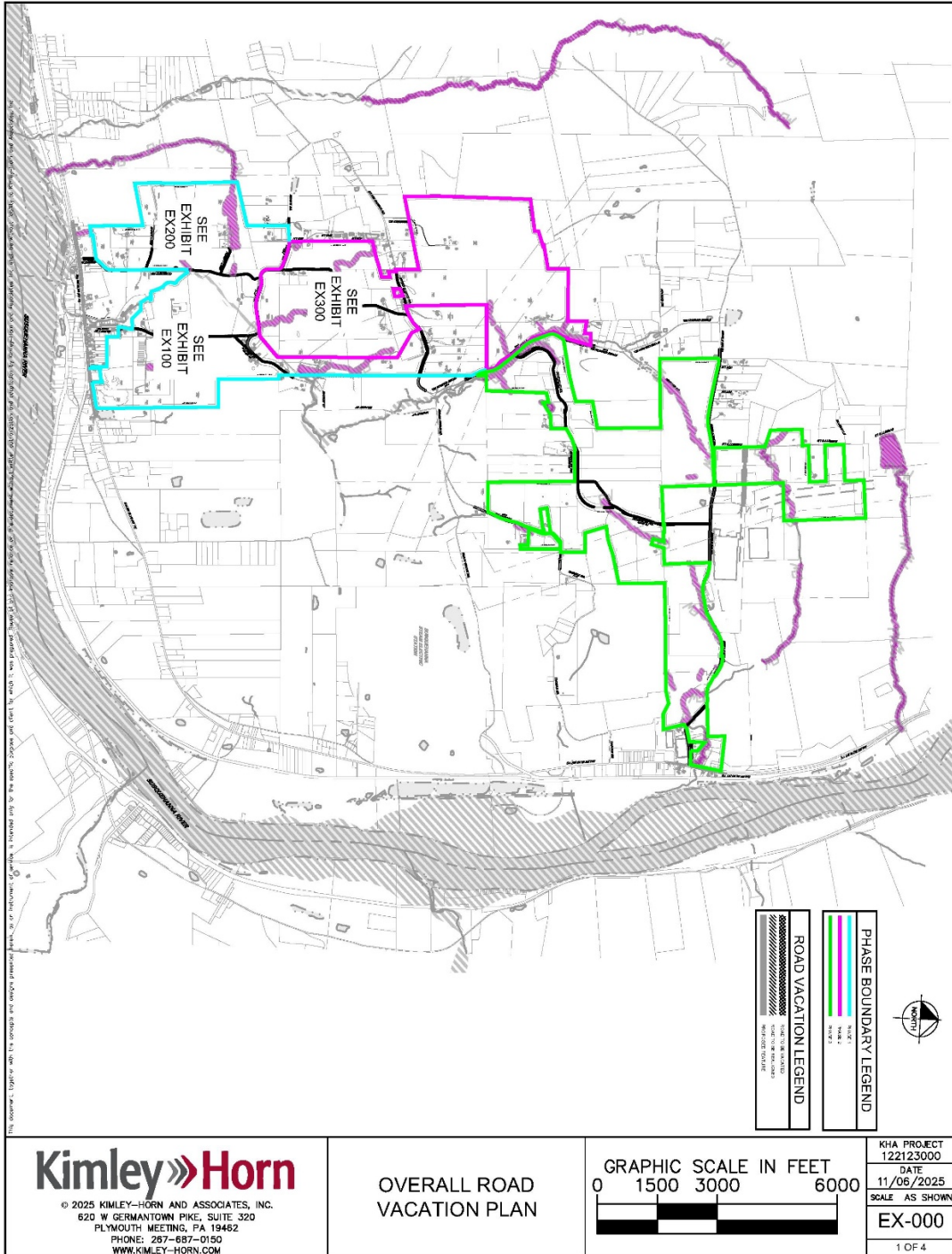
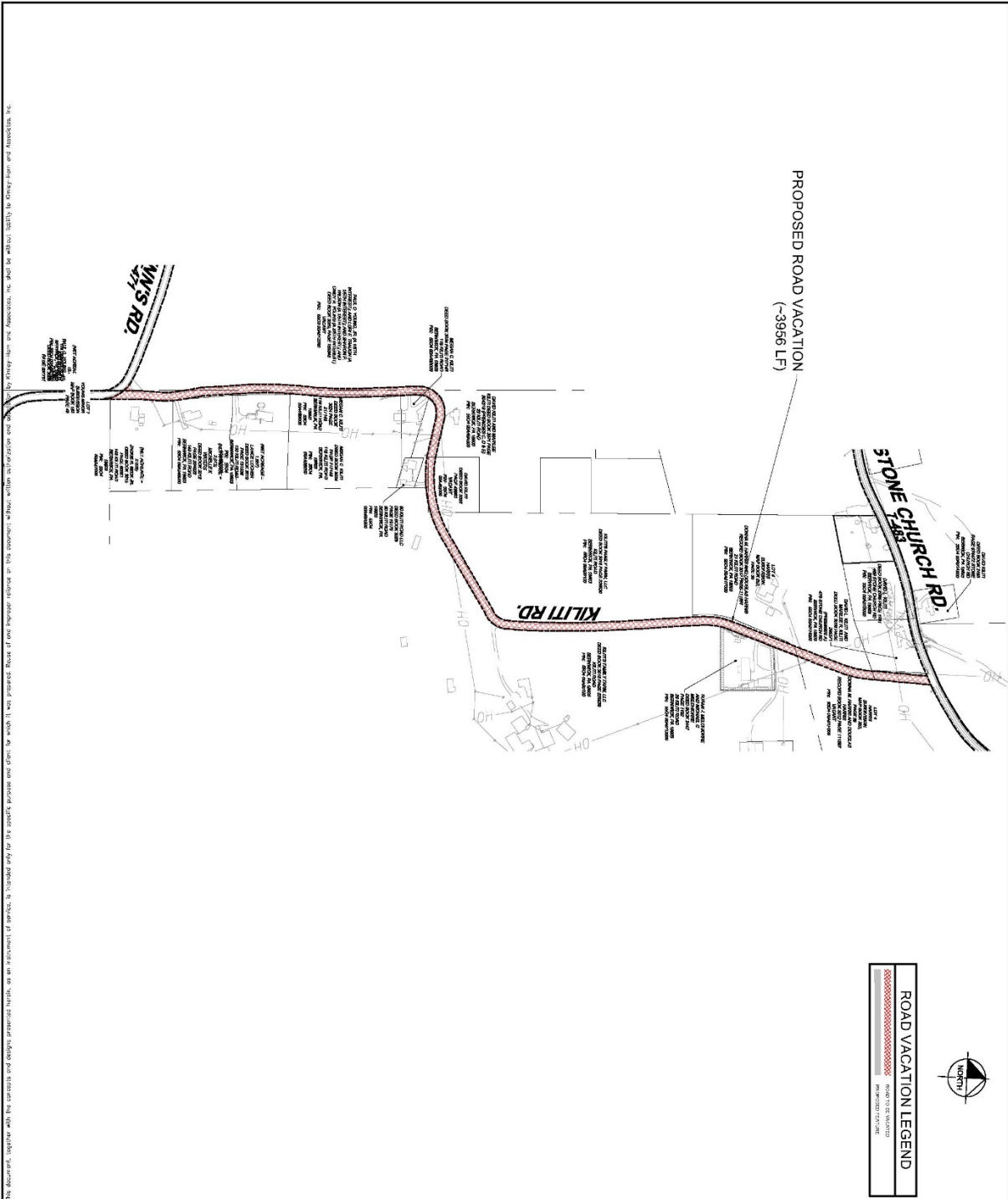


Exhibit A - 1



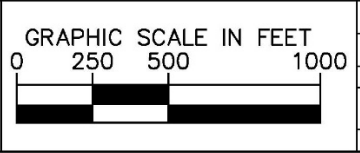
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ROAD VACATION LEGEND	
	ROAD TO BE VACATED
	ROAD TO BE MAINTAINED



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ROAD VACATION PLAN
 PHASE 2S



KHA PROJECT	122123000
DATE	03/12/2026
SCALE	AS SHOWN
EX-200	
3 OF 4	

Exhibit A - 3

