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January 28, 2019

Salmon-Challis National Forest  
ATTN: FPR/Wilderness  
1206 S. Challis Street  
Salmon, ID 83467

**RE: Comment on Salmon-Challis National Forest Wilderness Evaluation Process**

Thank you for the opportunity to comment on the Salmon-Challis National Forest Wilderness Evaluation Process (the "Process") and for taking our comments into consideration.

Revival Gold ("Revival Gold" or, the "Company") is opposed to the United State Forest Service ("USFS") potentially designating large tracts of the Salmon-Challis National Forrest (the "Forrest") as wilderness ("Wilderness") to be included in the National Wilderness Preservation System. The USFS has many land management tools at its disposal to effectively manage lands on a site-specific basis for the benefit of those that have an interest in the Forest. As the Wilderness designation is extremely restrictive, Revival Gold believes that the designation should be used sparingly and only for those areas needing special protection. We note that large areas of the Forest have been previously evaluated and deemed not fit for Wilderness designation.

Revival Gold is an active member of the Lemhi County business community and a publicly traded company (both in the United States and in Canada). The Company controls approximately 12,600 acres of valid mineral claims (including patented and unpatented claims) within the Forrest (specifically the former producing Beartrack Mine and neighbouring Arnett Gold project) and has a vested interest in the Process. We represent the interests of Company employees, contractors and shareholders, many of whom reside in Lemhi County. Although Revival Gold's current mineral claims appear to be excluded from any of the Focal Wilderness Evaluation Areas, the Company's operations, along with those of our peers, would be severely impacted by the designation of part, or all, of the Forrest as Wilderness.

The areas under evaluation within the Forrest have a well documented active mining history. The presence of mineral resources and the potential for future discovery in these areas underpins an important source of economic activity for local communities and has the potential to provide a meaningful contribution to future domestic U.S. mineral production. For this reason, the "imprint of man's work substantially unnoticeable" criteria under the Process is not applicable to much of this area.

The USFS's past and current practise of allowing responsible mineral development within the Forest, has resulted in a landscape "touched by man". And yet, under these same USFS management practises, the Forest and resident wildlife populations have proven to be sustainable. Indeed, in addition to economic activity, the Forest has also been able to provide users with unique multiple-use recreational opportunities. There is no critical need for designating the Forest as Wilderness in order to ensure future sustainability or support recreational use.



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Apart from an assessment of the potential wilderness value of land under evaluation, the USFS must consider the mineral history and resource potential of any areas to be designated under the Wilderness Act. We understand that it is not the intent of the Wilderness Act to tie up valuable mineral resources that are important to the U.S. economy and domestic production capability. Given the long history of mining in Lemhi County, the current level of responsible mineral exploration and development activity that depends on access to the Forest, and the geologic importance of the area to future domestic United States mineral production, designating a large block the Forest is inconsistent with Wilderness criteria. Hundreds of current and potential future jobs in the mineral industry, future mineral extraction tax revenue, infrastructure development and maintenance activities and support for local economies would disappear if part or all the Forest were to be designated as Wilderness. In addition to removing a very large land position from future potential mineral exploration and development, increased Wilderness acreage would decrease the level of access to surrounding "non-Wilderness" areas and reduce the attraction for investment in mineral exploration and development elsewhere in the County and the State of Idaho.

In our view, removal of the Forest from potential mineral exploration and development is unnecessary and would fail to recognize the important past and future role of mineral exploration and development to local, state and national economies. Geologic inference suggests that mineral opportunities remain widespread throughout the area.

Revival Gold urges the USFS to promptly complete its Process and to move forward without designating all, or any part, of the Forest as Wilderness. The Company and its affiliates will vigorously defend itself in any state or federal court of law against any abuse or infringement of its property rights or interests in Lemhi County.

We kindly request that you please keep us informed on the status of the Process and any developments. If you would like further input or to discuss any of the above matters, please don't hesitate to let me know.

Regards,

Hugh Agro  
President and CEO

CC: Senator Mike Crapo, Senator James E. Risch,  
Representative Mike Simpson, Representative Russ Fulcher, Representative Dorothy Moon  
Mr. John Chatburn, Idaho Governor's Office of Energy and Mineral Resources  
Mr. Benjamin Davenport, Idaho Mining Association  
Mr. Mark Compton, Executive Director, American Exploration & Mining Association